

3.8 Hazards and Hazardous Materials

This section describes and evaluates potential impacts related to hazards and hazardous materials that could result from construction and operation of the Proposed Project. The section contains: (1) a description of the existing land uses of the Project Site and surrounding areas as they pertain to hazardous materials use, as well as a description of the Adjusted Baseline Environmental Setting; (2) a summary of the federal, State, and local regulations related to hazards or hazardous materials; and (3) an analysis of the potential impacts related to hazards and hazardous materials associated with the implementation of the Proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

Comments received in response to the NOP for the EIR regarding hazards and hazardous materials can be found in Appendix B. Any applicable issues and concerns regarding potential impacts related to hazards and hazardous materials as a result of implementation of the Proposed Project are analyzed within this section.

The analysis of hazardous materials included in this section was developed based on publicly available information from the State Water Resources Control Board (SWRCB), California Department of Toxic Substances Control (DTSC), and California Department of Forestry and Fire Protection (CAL FIRE). In addition, two site specific technical memoranda prepared by Environment & Water, Incorporated (EKI) provided information regarding the potential presence of contamination in subsurface materials on the Project Site (see Appendix O); these memoranda were peer reviewed by ESA and considered in the analysis. The EKI technical memorandum titled *Inglewood Basketball and Entertainment Center Project Investigations* presents information developed in 2017, and did not originally include a database search of the Well Relocation Site.¹ Therefore, data regarding the potential for contamination in subsurface materials was supplemented with a database search conducted by GeoSearch in accordance with American Society for Testing and Materials E 1527-13 (see Appendix O).² A subsequent investigation in 2019 and presented in a technical memorandum titled *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations* provided soil and gas sampling data for the Well Relocation Site and the West Parking Garage Site which were also not covered in the 2017 investigation effort.³ Portions of the Project Site were also the subject of past phase I environmental site assessments that were included as part of this analysis and referenced, as relevant, below.

This section also addresses the potential of creating both temporary and permanent hazards related to the proximity of the Project Site to navigable airspace associated with airports in the vicinity. An obstruction evaluation and airspace analysis technical memorandum for the Proposed

¹ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019.

² GeoSearch, 2018. *Preliminary Radius Report*. December 27, 2018.

³ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019.

Project was prepared by Capitol Airspace Group (CAG) (see Appendix P).⁴ The technical memorandum was peer reviewed by airport planners from ESA, including confirmation that all information from each of the relevant airports is current; the results of the peer review was that the technical memorandum was accurate and objective, and appropriate for use in this Draft EIR.

3.8.1 Environmental Setting

The study area for evaluation of hazards and hazardous materials impacts includes the Project Site and surrounding areas. The EKI technical memoranda included an environmental database search that considered selected radii that are as much as 1 mile from the site; however, the analysis focused on the Project Site and the immediately adjacent area (within 0.25 miles from the Project Site). Sites beyond the immediately adjacent area (within 0.25 miles from the Project Site) would have a remote chance of affecting subsurface materials beneath the Project Site since releases of hazardous materials tend to be localized.

In addition, a radius of up to 0.25 miles from the Project Site is considered relative to proximity to schools and the radius of up to 2 miles is similarly considered relative to proximity to airports, both in accordance with the CEQA Guidelines.

Definitions and Background

Hazardous Materials

A hazardous material is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (California Health and Safety Code Chapter 6.95, section 25501(o)). The term “hazardous materials” refers to both hazardous substances and hazardous wastes. Under federal and state laws, any material, including wastes, may be considered hazardous if it is specifically listed by statute as such or if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes explosions or generates toxic gases).

Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been spent, discarded, discharged, spilled, contaminated, or are being stored until they can be disposed of properly (Title 22 California Code of Regulations [CCR] section 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific criteria established in sections 66261.20 through 66261.24 of the CCR Title 22. Hazardous substances are regulated by multiple agencies, as described in the Regulatory Setting below, and cleanup requirements of hazardous releases are determined on a case-by-case basis according to the agency (e.g., DTSC or SWRCB) with lead jurisdiction over a contaminated site.

⁴ Capitol Airspace Group, 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017, and Capitol Airspace Group, 2019. *IBEC Project A description of Aeronautical Study Process and Results of an Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, May 10, 2019.

Potential Receptors/Exposure

The sensitivity of potential receptors in the areas of known or potential hazardous materials contamination is dependent on several factors, the primary factor being the potential pathway for human exposure. Exposure pathways include external exposure, inhalation, and ingestion of contaminated soil, air, water, or food. The magnitude, frequency, and duration of human exposure can cause a variety of health effects, from short-term acute symptoms to long-term chronic effects. Potential health effects from exposure can be evaluated in a health risk assessment. The principal elements of health risk assessments typically include:

- Evaluation of the fate and transport processes for hazardous materials at a given site;
- Identification of potential exposure pathways;
- Identification of potential exposure scenarios;
- Calculation of representative chemical concentrations; and
- Estimation of potential chemical uptake.

Hazardous Building Materials Associated with Demolition and Renovation

Because of the age of some buildings and structures within the Project Site, the potential exists for the structures to contain hazardous building materials. Older buildings and structures can contain building materials that include hazardous components such as lead-based paint (LBP), asbestos-containing materials (ACMs), mercury, and polychlorinated biphenyls (PCBs).

Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils around buildings and structures painted with LBP. Old peeling paint can contaminate near surface soil, and exposure to residual lead can have adverse health effects especially in children. LBP was phased out in the United States beginning with the passage of the Lead-Based Paint Poisoning Prevention Act in 1971. Prior to the US Environmental Protection Agency (US EPA) ban in 1978, LBP was commonly used on interior and exterior surfaces of buildings. Structures built prior to 1978 may have LBP and some paints manufactured after 1978 for industrial or marine uses legally contain more than 0.06 percent lead. Pathways of exposure to lead can occur through inhalation, ingestion, dermal absorption, or absorption from retained/embedded leaded foreign body. Exposure to lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system, and affects the oxygen carrying capacity of blood. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs.

Asbestos, a naturally occurring fibrous material, was used as a fireproofing and insulating agent in building construction before such uses were terminated due to liability concerns in the late 1970s. From 1973 through 1990, several laws were passed banning the manufacture and use of

ACM.⁵ Some materials are still allowed to contain asbestos. The demolition of structures with ACM can result in airborne fibers. Inhalation of the tiny asbestos fibers can lead to lung disease. Structures that predate 1981 and structural materials installed before 1981 are presumed to potentially contain asbestos. Because it was widely used prior to the discovery of its health effects, asbestos can be found in a variety of building materials and components such as insulation, walls and ceilings, floor tiles, and pipe insulation. Friable (easily crumbled) materials are particularly hazardous because inhalation of airborne fibers is the primary mode of asbestos entry into the body. Non-friable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Non-friable asbestos and encapsulated friable asbestos do not pose substantial health risks. Asbestos exposure is a human respiratory hazard. Asbestos-related health problems include lung cancer and asbestosis. Any activity that involves cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities could release friable asbestos fibers unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, making friable materials the greatest potential health risk.

Spent fluorescent light tubes commonly contain mercury vapors, the exposure to which can have both long-term (e.g., anxiety, loss of appetite, fatigue, changes in vision or hearing) and/or short-term (e.g., sore throat, shortness of breath, chest pain, headache, vision problems) health effects. In February 2004, regulations took effect in California that classified all fluorescent lamps and tubes as hazardous waste. When these lamps or tubes are broken, mercury is released to the environment and can become airborne. When inhaled, mercury vapors can be absorbed through the lungs and into the bloodstream. Released mercury that is not vaporized can also be washed by rain water and into waterways. Mercury switches may also be present in some buildings. A mercury switch (also known as a mercury tilt switch) is a switch which opens and closes an electrical circuit through a small amount of liquid mercury.

PCBs are organic oils that were formerly used primarily as insulators in many types of electrical equipment such as transformers and capacitors. After PCBs were determined to be carcinogenic in the mid-to-late 1970s, the US EPA banned PCB use in most new equipment and began a program to phase out certain existing PCB-containing equipment.⁶ Fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit. PCBs are highly persistent in the environment, and exposure to PCBs has been demonstrated to cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system. The primary route of exposure to PCBs in the general population is the consumption of contaminated foods, particularly meat, fish, and poultry. Occupational exposure to PCBs occurs mainly through inhalation and dermal contact routes.

⁵ US Environmental Protection Agency, 2018. *Federal Bans on Asbestos*. Available: <https://www.epa.gov/asbestos/us-federal-bans-asbestos>. Last Updated August 9, 2018. Accessed November 14, 2018.

⁶ US Environmental Protection Agency, 2018. *Policy and Guidance for Polychlorinated Biphenyl (PCBs)*. Available: <https://www.epa.gov/pcbs/policy-and-guidance-polychlorinated-biphenyl-pcbs>. Last Updated April 25, 2017. Accessed November 14, 2018.

Soil and Groundwater Contamination

Many commercial and light industrial businesses, as well as some agricultural practices, use materials and generate wastes that are considered hazardous by federal and State standards. Such businesses and practices, which include automobile service, industrial manufacturing, and dry cleaners, are required to contain, manage, and transport their hazardous materials in conformance with established State regulations to ensure hazardous materials that can become a health hazard are not released to subsurface soils and groundwater.

Some historical and current uses on properties within and near the Project Site have resulted in contamination of the surface soil and groundwater through leaking underground tanks or surface spills of hazardous materials and petroleum. Most of these sites are under regulatory assessment and remediation orders (described further below).

Underground storage tanks (USTs), in particular, are a common contamination source in urban areas, and are also found on sites historically used for agriculture. Until the mid-1980s, most USTs were made of single-walled bare steel, which can corrode over time and result in leakage. Faulty installation or maintenance procedures can also lead to UST leakage, as well as to potential releases associated with spills. Recently revised UST regulations have significantly reduced the incidents of leakage and consequential soil and groundwater contamination from new UST systems. However, there are still some older UST systems that remain in service, and many sites contaminated by leaking USTs in the past are still under investigation and undergoing clean-up. Similarly, spills resulting from poor maintenance or improper installation associated with aboveground storage tanks (ASTs) can result in localized, shallow soil contamination. USTs installed prior to the mid-1980s that have leaked, as well as improperly installed USTs and ASTs that have resulted in fuel spills, can present contamination issues.

Dry cleaning operations are also commonly a cause of soil and groundwater contamination due to past loose practices in the handling of the dry cleaning products (also referred to as solvents) that include volatile organic compounds (VOCs) that are known to be hazardous to human health and the environment. VOCs include a variety of chemicals, some of which may have short- and long-term adverse health effects. The ability of VOC chemicals to cause health effects varies greatly and depend on a number of factors including exposure level and length of time exposed but can be anywhere from being highly toxic, to having no known health effect. Health effects may include eye, nose, and throat irritation; headaches; skin irritation, nausea, damage to liver, kidney, and central nervous system; and cancer. Dry cleaning solvents generally consist of tetrachloroethylene (PCE) and trichloroethylene (TCE) which have a high solubility factor making them easily transmitted in groundwater to off-site locations. Contamination from PCE, TCE, its degradation products (including vinyl chloride) and other chlorinated compounds can be very difficult to remove from the environment, especially once they reach groundwater.

Project Site

Arena Site

The majority of the Arena Site is currently vacant land that is owned by the City or Successor Agency with 10 parcels owned by other parties that are used for commercial land uses. The vacant parts of the Project Site were previously developed, but were purchased by the City and cleared of uses that were incompatible with noise levels in compliance with Federal Aviation Administration (FAA) grants. In addition, the Arena Site includes an existing City water supply well and associated infrastructure. Historically, the Project Site was predominantly occupied by single-family residential properties and vacant/agricultural land uses starting in approximately 1923.⁷ Based on historical aerial photographs from 1928 to 1947, the land uses continued as residential, with possible apartment development in the eastern portion of the site by 1947. In 1952 there is evidence of a mobile home/trailer park. An automobile service station was also developed in the northwestern corner of the Arena Site by 1952, which operated until the 1970s when it was demolished and replaced by a fast food restaurant. More apartments and/or hotels are indicated in photographs from 1963 and continue as such during the time period of 1977 to 1994. Beginning in the mid-1980s, the FAA issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of disposing and recycling incompatible land uses to land uses which are compatible with the noise levels of airport operations. Under that program, the FAA and the City of Inglewood approved the acquisition of a number of parcels on the Project Site, and, as a result, many residential structures were acquired by the City and demolished. By 2002,⁸ the eastern and southern portions of the Arena Site were vacant. The Arena Site is relatively level with an elevation of approximately 89 feet above mean sea level and a slight topographic gradient towards the south-southwest.

West Parking Garage Site

The two surface parking lots that are part of the West Parking Garage Site are both currently vacant, unpaved lots; however, they have a history of land uses that include residential and commercial properties. Prior to residential development that began in the 1920s and 1930s, the parking sites were likely used for agriculture. According to review of aerial photographs, residential land uses continue throughout the period from the 1930s up until 2013, although some residences had begun to be demolished by the early 2000s. Some commercial/retail uses along West Century Boulevard show up in the period between 1977 and 1983. The northern surface parking lot site was completely cleared in 2013, and the southern lot was completely cleared in 2002.⁹

East Transportation and Hotel Site

The East Transportation and Hotel Site is currently a vacant, unpaved lot with a history of residential land uses. Initially, this site was developed with single family residences and small-

⁷ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 4.

⁸ Timeline is largely developed from the review of aerial photographs in the EKI, 2017 Technical Memorandum which skips from 1994 to 2002.

⁹ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 6.

scale agricultural properties in the 1920s and 1930s. Later uses included a trailer park, and all buildings were demolished in 1989. Similar to the surrounding area, the site is relatively level.

Well Relocation Site

The Well Relocation Site is also vacant and unpaved with no improvements other than fencing around the perimeter of the site. According to a review of permit records, Sanborn maps, and historic aerial photographs, the two parcels that make up this site were developed with residential uses as early as 1924.¹⁰ Agricultural uses may have occurred prior to the 1920s. By 1962, the Well Relocation Site was subdivided, and the larger parcel was redeveloped with an apartment complex, which was then demolished sometime between 1994 and 2003. The smaller parcel was used for residential land uses up until they were demolished sometime between 2012 and 2014.

Database Search Project Site

The EKI technical memorandum included a database search of the Project Site and surrounding vicinity that was completed by Environmental Data Resources, Incorporated (EDR).¹¹ The results of the database search by EDR included the following (see **Figure 3.8-1**):

Arena Site

1. The property at 3900 West 102nd Street is listed as “Various City Properties” in the National Pollutant Discharge Elimination System (NPDES) database for discharges associated with demolition and construction activities. This database listing is not an indication of any release or violation.
2. The existing City water well site at 3901 West 102nd Street is listed as “Well No. 6” in the SWRCB Enforcement Action and SWRCB Waste Discharge System databases. This database listing is not an indication of any release or violation.
3. The property at 3901 West 102nd Street is also listed as “Inglewood Redevelopment Agency” in the DTSC Hazardous Waste Manifest database, which reported the disposal of 33 tons of asbestos-containing waste to a landfill. This database listing is not an indication of any release or violation.
4. The property at 3901 West 102nd Street is also listed as “Well No. 1NA 2NA 4 & 6” in the Facility Index System (FINDS) database as a water supply well or wells. This database listing is not an indication of any release or violation.
5. The property at 10220 South Prairie Avenue is listed as “E & M German Car Repair” in the 1990–1992 historical EDR auto databases. Based on other data sources that were reviewed as part of the EKI technical memorandum, this address was determined to be erroneous, and the auto repair facility is associated with the 10223 South Prairie Avenue property to the west, across South Prairie Avenue (discussed further below under “Surrounding Areas”).
6. The property at 3822 West Century Boulevard is listed as “Omega Carpet & Uphl Stm Cleani” in the EDR historical cleaner database from 1992. Dry cleaners often used solvents such as PCE or TCE. Dry cleaning operations that used solvents have commonly released

¹⁰ ESA, *Well Relocation Site – Historic Uses*, Technical Memorandum, December 28, 2018. Note, the Well Relocation Site was not included as part of the EKI technical memorandum. However, the ESA memorandum takes a similar approach to identifying land use history that the EKI memorandum uses.

¹¹ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 12.

solvents to the subsurface and because of their solubility can easily be dispersed by groundwater. Laboratory analysis of VOC compounds is the method used to identify whether there is a release of solvents to the subsurface. This listing is an indication that a potential release could have occurred at this location based on the land use.

West Parking Garage Site

The database search did not include any addresses that appeared to coincide with the West Parking Garage Site, however former land uses that included a print and press shop (from approximately 1977 to 1983), as well as a former mobile home park (from approximately 1947 to 1994) were identified in the description of past land uses.¹² In addition, the adjoining property on the east was occupied by a Unocal service station that operated from approximately 1963 to 1990.

East Transportation and Hotel Site

The database search did not include any addresses that appeared to coincide with the East Transportation and Hotel Site.

Well Relocation Site

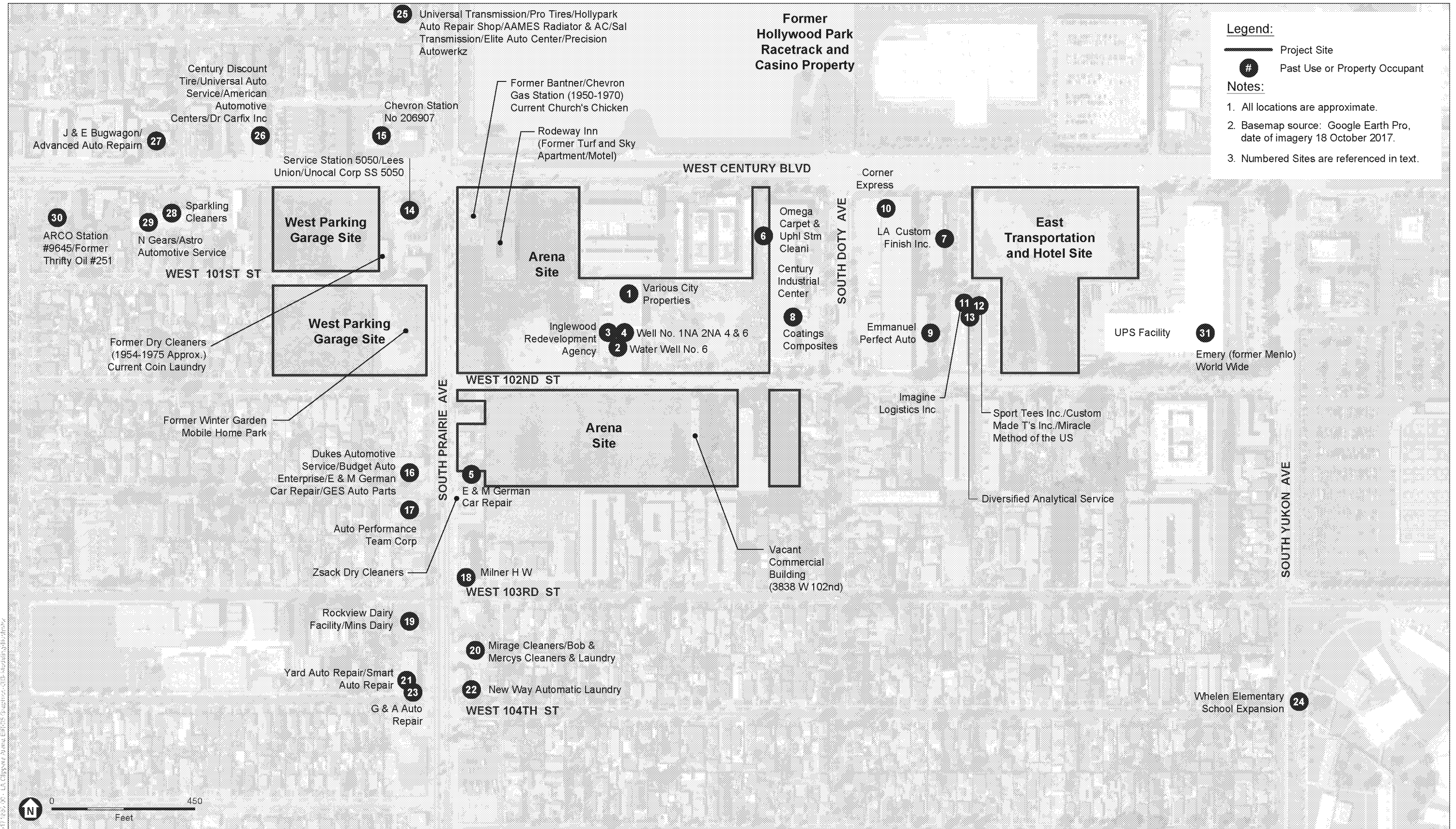
The findings from the database search in the EKI report did not find any addresses that appeared to coincide with the Well Relocation Site. However, a separate database search conducted specifically for this site included the Well Relocation Site as part of the Hazardous Waste Tanner Summary (HWTS) database records of hazardous waste manifests from the DTSC during 1993–2016.¹³ The site name associated with this listing in the database search is the Inglewood Redevelopment Agency. This record of a hazardous waste manifest is an indication that hazardous waste was transported from this site and is not necessarily an indication of any release at the site.

Surrounding Area

The Project Site is located in a developed urban area with a mixture of commercial, entertainment, industrial, and residential land uses surrounding the site. Industrial land uses include warehouse/manufacturing facilities and automobile service stations, while commercial uses include hotels, retail, and restaurants.

¹² EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 5-6.

¹³ GeoSearch, 2018. *Radius Report*. December 31, 2018, p. 18. The GeoSearch records search is comparable to the EDR database search contained within the EKI report.



Legend:
 [Rectangle] Project Site
 [#] Past Use or Property Occupant

Notes:
 1. All locations are approximate.
 2. Basemap source: Google Earth Pro, date of imagery 18 October 2017.
 3. Numbered Sites are referenced in text.

SOURCE: EKI, 2017 Inglewood Basketball and Entertainment Center

Figure 3.8-1
Database Search Results

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To the north of the Arena Site is the location of the former Hollywood Park Racetrack and Casino property, which is currently undergoing redevelopment. Prior to the racetrack, the property was used for agricultural purposes and the northeastern portion of the property was part of an oilfield where petroleum hydrocarbons have been detected. The racetrack opened in 1938 and the casino was added in 1994. Portions of the racetrack were also used for automobile fueling and maintenance, dry cleaning, wastewater treatment, and a veterinary hospital.¹⁴

According to the EKI technical memorandum, three areas were identified on the racetrack property where previous investigations had indicated the presence of chemicals of concern in the subsurface that could require additional assessment or remediation.¹⁵ These areas included a former dry cleaner on the racetrack property, the Cypress Fee site groundwater plume, and elevated methane in shallow soil gas at two locations on the racetrack property. A soil management plan (SMP) was prepared by EKI in 2007 that will be implemented as part of construction of the new development at the racetrack site. Localized areas of contamination would be addressed during construction such that following completion of activities, no known areas of the property would have contaminants of concern above the criteria established in the SMP.¹⁶ In 2008, as part of an earlier separate evaluation, EKI installed four groundwater monitoring wells on the racetrack property and monitored them for four quarters. Groundwater flow direction was highly variable and the water quality results indicated that chemicals of concern detected were part of regional plumes associated with widespread past agricultural land uses. However, there were no chemical uses on the property that were known to have migrated to the Project Site.¹⁷

Other surrounding properties identified in the EKI technical memorandum include the following sites with reported chemical use and/or releases that are upgradient of or adjacent to the Project Site (see Figure 3.8-1):

1. LA Custom Finish Inc., 3738 West Century Boulevard, between the Arena Site and East Transportation and Hotel Site along West Century Boulevard. This property is listed with use of unspecified solvent and organic mixtures, and is reportedly a painting business. This listing is an indication that a potential release could have occurred at this location based on the land use.
2. Coatings Composites, 10105 South Doty Avenue, between the Arena Site and East Transportation and Hotel Site. This property is listed as a hazardous waste generator of organic and inorganic chemicals, laboratory wastes, and solvents with no reports of releases. Despite no reported releases, the land use would indicate a potential for a release to have occurred.
3. Emmanuel Perfect Auto, 3742 West Century Boulevard, Suite 4, between the Arena Site and East Transportation and Hotel Site. This property is listed as an automotive repair shop in 1995–1996, and could have used total petroleum hydrocarbon (TPH)-containing compounds

¹⁴ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 17-18.

¹⁵ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 17-18.

¹⁶ City of Inglewood, 2008. *Draft Environmental Impact Report, Hollywood Park Redevelopment Project, Hazards and Hazardous Materials Section IV.F*, SCH No. 2007111018, October 9, 2008.

¹⁷ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Investigations*, Technical Memorandum, June 28, 2019, p. 18.

and solvents. This listing is an indication that a potential release could have occurred at this location based on the land use.

4. Corner Express, 3750 West Century Boulevard, between the Arena Site and East Transportation and Hotel Site. This property is listed as a generator of oil-containing waste, possibly from automotive repair shop operations. This listing is an indication that a potential release could have occurred at this location based on the land use.
5. Imagine Logistics Inc., 3734 West Century Boulevard, Suite 7, between the Arena Site and East Transportation and Hotel Site. This property is listed as a generator of organic chemicals. The property use is not listed, and there are no reports that a release of hazardous substances has occurred. This listing is an indication that a potential release could have occurred at this location based on the land use.
6. Sport Tees Inc./Custom Made T's Inc./Miracle Method of the US, 3732 West Century Boulevard, between the Arena Site and East Transportation and Hotel Site. This property is listed as a generator of organic chemicals, acids, hydrocarbon solvents, and organic solvents, and is listed as a laundry/dry cleaner. No indication of any releases are reported for the site. However, this listing is an indication that a potential release could have occurred at this location based on the land use.
7. Diversified Analytical Service, 3732 West Century Boulevard, Unit 3, between the Arena Site and East Transportation and Hotel Site. This property is listed as a generator of aqueous anionic solution, organic solids, contaminated soil from site cleanup, liquids with metals, and oil-water separation sludge. There are no reports that a release of hazardous substances has occurred. However, this listing is an indication that a potential release could have occurred at this location based on the land use.
8. Service Station 5050/Lees Union/Unocal Corp SS 5050, 4000 West Century Boulevard, at southwestern corner of South Prairie Avenue and West Century Boulevard. This property is a former vehicle fueling and service station with USTs. It was replaced by a fast food restaurant that is now shuttered and is currently a Starbucks cafe. TPH and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in groundwater samples from 1993 to 1996, when the monitoring wells were destroyed and the case was closed by the Regional Water Quality Control Board (RWQCB). The groundwater gradient was observed to the northeast. When last monitored in 1996, concentrations of residual fuel-related compounds in groundwater on the subject property were low, and the RWQCB closed the site. As a result, this listing does not indicate a potential for a release that could extend onto the Project Site.
9. Chevron Station No 206907, 4015 West Century Boulevard, north of the West Parking Garage Site at northwestern corner of South Prairie Avenue and West Century Boulevard. The site is a current vehicle fueling and service station with USTs, and the site is shared with a fast food restaurant. Two USTs were installed in 1998 at the site: a 15,000-gallon gasoline UST and a 20,000-gallon gasoline UST. The available records do not list releases to the subsurface, and no soil or groundwater data are available for this site. However, this listing is still an indication that a potential release could have occurred at this location based on the land use.
10. Dukes Automotive Service/Budget Auto Enterprise/E & M German Car Repair/GES Auto Parts, 10223 South Prairie Avenue, approximately 250 feet south of the surface parking lots and across South Prairie Avenue from the Arena Site. This site is an auto repair shop with records dating from 1969 to the present. Records show that tanks were reportedly removed in 1987. However, in 1988, records show the site contained one 2,000-gallon UST and two 4,000-gallon USTs for storage of "product" which could represent replacement tanks for the

ones removed. The available records do not indicate releases to the subsurface, and no soil or groundwater data are available for this site. This listing is an indication that a potential release could have occurred at this location based on the land use.

11. Auto Performance Team Corp, 10305 South Prairie Avenue, 130 feet southwest of the Arena Site. This site is listed as an auto repair shop from 2006 to 2014, and was observed to be an auto repair shop during the site visit on October 24, 2017. This listing is an indication that a potential release could have occurred at this location based on the land use.
12. Milner H W, 10324 South Prairie Avenue/10396 South Prairie Avenue, approximately 90/320 feet south of the Arena Site. These addresses are listed for the same property also are listed as a historical gasoline and oil service station in 1927 and 1940, no other records indicating property use are available. A relatively newer structure currently occupies the site that appears to be for commercial retail offices. The historical land use, however, indicates a potential for a release to have occurred, however, the age of the land use would indicate that if any releases had occurred, natural attenuation would likely have reduced any potential threat to human health or the environment for most petroleum hydrocarbons.
13. Rockview Dairy Facility/Mins Dairy, 10411 South Prairie Avenue, 490 feet south of the Arena Site. This property is listed as a convenience store from 1988 to 1996, and was part of a RWQCB cleanup site from 1993 to 1997. USTs were reportedly removed from the site in 1993. The GeoTracker database lists the soil as impacted by gasoline, and the case was closed in 1997.¹⁸ Closure would indicate that no further threat to human health or the environment remains.
14. Mirage Cleaners/Bob & Mercys Cleaners & Laundry, 10412 South Prairie Avenue, 490 feet south of the Arena Site. This property is listed as a dry cleaner or laundry from 1971 to 2006, and reportedly handled PCE. The site no longer appears to be a cleaner or laundry. This listing is an indication that a potential release could have occurred at this location based on the land use.
15. Yard Auto Repair/Smart Auto Repair, 10421 South Prairie Avenue, 490 feet south of the West Parking Garage site. This site is listed as an auto repair facility from 1987 to 2005, and appeared to be a block with three to four connected auto repair shops. This listing is an indication that a potential release could have occurred at this location based on the land use.
16. New Way Automatic Laundry, 10424 South Prairie Avenue, 430 feet south of the Arena Site. This site is listed as a historical laundry or dry cleaner in 1964. This listing is an indication that a potential release could have occurred at this location based on the land use.
17. G & A Auto Repair, 10427 South Prairie Avenue, 450 feet south of the Arena Site. This site is listed as an auto repair facility from 1990 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
18. Whelen Elementary School Expansion, West 104th/105th Street, 420 feet south of the West Parking Garage Site. This school site is listed in the DTSC database, with reported investigation of LBP from demolished residential buildings conducted from 1999 to 2006. The buildings reportedly were built in the 1950s. The lead concentrations in soil were below the DTSC screening level of 255 milligrams per kilogram (mg/kg), and the site was closed by the DTSC. Closure would indicate that no further threat to human health or the environment remains.
19. Universal Transmission/Pro Tires/Hollypark Auto Repair Shop/AAMES Radiator & AC/Sal Transmission/Elite Auto Center/Precision Autowerkz, 1201 South Prairie Avenue, 500 feet

¹⁸ GeoTracker is the environmental database maintained by the SWRCB that tracks sites with a history of releases to the subsurface that are overseen by the local Regional Water Resources Control Board.

north of the West Parking Garage Site. This site is listed as an auto repair facility from 1940 to 2014. 1203 and 1205 South Prairie Avenue have entries for Ralph's Automotive Service and Tri-State Gasoline, and appear to be for the same strip mall property containing multiple auto repair facilities. In 1987, the LADPW received an application for a 550-gallon double walled fiberglass tank that was for vehicle waste oil. No spills or leaks for the property are reported in available agency files. This listing is an indication that a potential release could have occurred at this location based on the land use.

20. Century Discount Tire/Universal Auto Service/American Automotive Centers/Dr Carfix Inc., 4055 West Century Boulevard, immediately north of the West Parking Garage Site across West Century Boulevard. This site is listed as an auto repair facility from 1988 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
21. J & E Bugwagon/Advanced Auto Repair, 4101 West Century Boulevard, 330 feet west of the West Parking Garage Site, across West Century Boulevard: this site is listed as an auto repair facility from 1988 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
22. Sparkling Cleaners, 4102 West Century Boulevard, 330 feet west of the West Parking Garage Site. This site is listed as a historic laundry or dry cleaner in 1964, but no current laundry or dry cleaning facility appears to be present at this property. This listing is an indication that a potential release could have occurred at this location based on the land use.
23. All N Gears/Astro Automotive Service, 4110 West Century Boulevard, 420 feet west of the West Parking Garage Site. This site is listed as an auto repair facility from 1986 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
24. ARCO Station #9645/Former Thrifty Oil #251, 4130 West Century Boulevard, 690 feet west of the West Parking Garage Site. This site is listed with six USTs: one 8,000-gallon UST for gasoline, one 15,000-gallon UST for gasoline, one 10,000-gallon UST for gasoline, one 6,000-gallon UST for gasoline, one 280-gallon UST for waste oil, and one UST of unknown capacity for waste oil. A different listing of USTs from a different database indicates the site had five USTs: three 12,000-gallon USTs for gasoline, one 15,000-gallon UST for gasoline, and one UST of unknown size and use. The site is also listed with a leaking UST case currently under regulatory oversight, and as a small quantity hazardous waste generator. The site disposed of aqueous solution with less than 10 percent organics, organic solids, waste oil, and oil/water separation sludge. TPH, BTEX, and methyl tertiary butyl ether (MTBE) were detected in soil samples collected during UST removal activities, and approximately 900 cubic yards of soil were excavated and removed. Groundwater has not been sampled at this site. This listing is an indication that a potential release could have occurred at this location based on the land use and ongoing regulatory oversight.
25. Emery (former Menlo) World Wide, 3600 West Century Boulevard, 360 feet east of the East Transportation and Hotel Site. The site has recorded UST use. One 10,000-gallon gasoline UST was removed in July 2002. A 20,000-gallon diesel UST remains at the site and was permitted and in use as of 2007. Diesel fuel was detected in soil samples collected from the surface to 30 feet below ground surface (bgs) near the existing diesel UST in 1994. Groundwater at the site has reportedly not been investigated. Diesel fuel in soil at depths of up to 40–50 feet bgs were observed in later investigations. The RWQCB closed the case in 2015 after concurring with additional investigations by the responsible party showing groundwater was not affected by releases from the site. Closure indicates that no further threat to human health or the environment remains.

Shallow Soil Sampling at Project Site

As part of the evaluation to determine the potential presence of legacy contaminants in the subsurface soils at the Project Site, EKI also collected surface soil samples for laboratory analysis. The samples were collected at locations on the Arena Site and the East Transportation and Hotel Site, and also included sampling the existing soil stockpiles on the Arena Site. The West Parking Garage Site and Well Relocation Site were also sampled in a subsequent effort in March 2019.¹⁹ The samples in both investigations were analyzed for presence of TPH, VOCs, metals, polynuclear aromatic hydrocarbons (PAHs), PCBs, pesticides, and herbicides. Samples were collected at the near surface (0 to 1 foot bgs) and between 4 and 5 feet bgs (locations are shown in **Figure 3.8-2**).

The analytical results were compared to the US EPA Regional Screening Levels (RSLs) for residential and also commercial/industrial land uses, as modified by DTSC Human and Ecological Risk Office (HERO) Note 3. These screening levels are referred to as the “HERO Note 3-modified RSLs” and are not considered to be cleanup threshold concentrations, but screening levels that are intended to be a health-conservative preliminary evaluation of potential risk and hazard based on planned land uses. The HERO Note 3 modified RSLs for residential land uses are lower than the commercial/industrial land uses because residential land uses are what would potentially be most sensitive, representing the highest potential exposure to health risk.

Total Petroleum Hydrocarbons

The laboratory analytical results for TPH in soil samples showed that diesel- and motor-oil-range TPH were detected above the HERO Note 3-modified RSLs for residential land use (96 and 2,500 mg/kg, respectively) in four samples: the 0 to 1-foot-bgs samples in sampling areas PC-4 (Arena Site – north), PC-6 (East Transportation and Hotel Site) and PC-9 (Arena Site – south), and the stockpile sample in area PC-9 (see Figure 3.8-2). Diesel- and motor-oil-range TPH was not detected above the residential screening levels at the West Parking Garage Site or Well Relocation Site. The highest detected concentrations of diesel- and motor-oil-range TPH at 940 mg/kg and 2,700 mg/kg, respectively, were found in the sample collected from 0 to 1 foot bgs in area PC-6. Gasoline-range TPH was not detected above the HERO Note 3-modified RSL for residential land use (82 mg/kg) in any of the samples collected. The motor-oil-range TPH detections for all samples were below the HERO Note 3-modified RSL for commercial/industrial land use (33,000 mg/kg), but the diesel-range TPH detections were above the HERO Note 3-modified RSL for commercial/industrial land use (440 mg/kg).

¹⁹ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 1.

Metals

The laboratory analytical results for metals (including hexavalent chromium and mercury) in soil samples showed concentrations all below the respective HERO Note 3-modified RSLs for residential land use with the exception of hexavalent chromium and thallium.²⁰

Hexavalent chromium was detected in one sample (PC-2) from the 4- to 5-foot-bgs depth on the northern portion of the Arena Site at a concentration of 0.490 mg/kg, which is above the screening level of 0.3 mg/kg.²¹ Hexavalent chromium was also detected above the HERO Note 3-modified RSLs at the West Parking Garage Site and Well Relocation Site in all of the 0- to 1-foot and 4- to 5-foot samples, ranging from 0.34 to 0.60 mg/kg.²² However, the laboratory also reported hexavalent chromium in the method blank, a quality assurance/quality control (QA/QC) measure, that would indicate a laboratory contaminant may have affected results.²³

Thallium was detected in the sample collected from 0 to 1 foot bgs in area PC-11 (West Parking Garage Site) at 0.858 mg/kg, just above the residential land use screening level of 0.78 mg/kg.

The surface soil samples (0 to 1 foot bgs) were also analyzed using a portable field method for the presence of arsenic and lead. The analytical results for arsenic showed one sample slightly above the DTSC regional background level in the northern portion of the Arena Site (12.1 mg/kg in PC-2 compared to background threshold of 12 mg/kg). Lead was detected above the HERO Note 3-modified RSL for residential land use of 80 mg/kg in 11 of the 52 soil samples analyzed in 2017 and 2 of 25 samples analyzed in 2019 using the field method, at concentrations up to 221 mg/kg (PC-7). Lead was not detected above the HERO Note 3-modified RSL for commercial/industrial land use of 320 mg/kg.

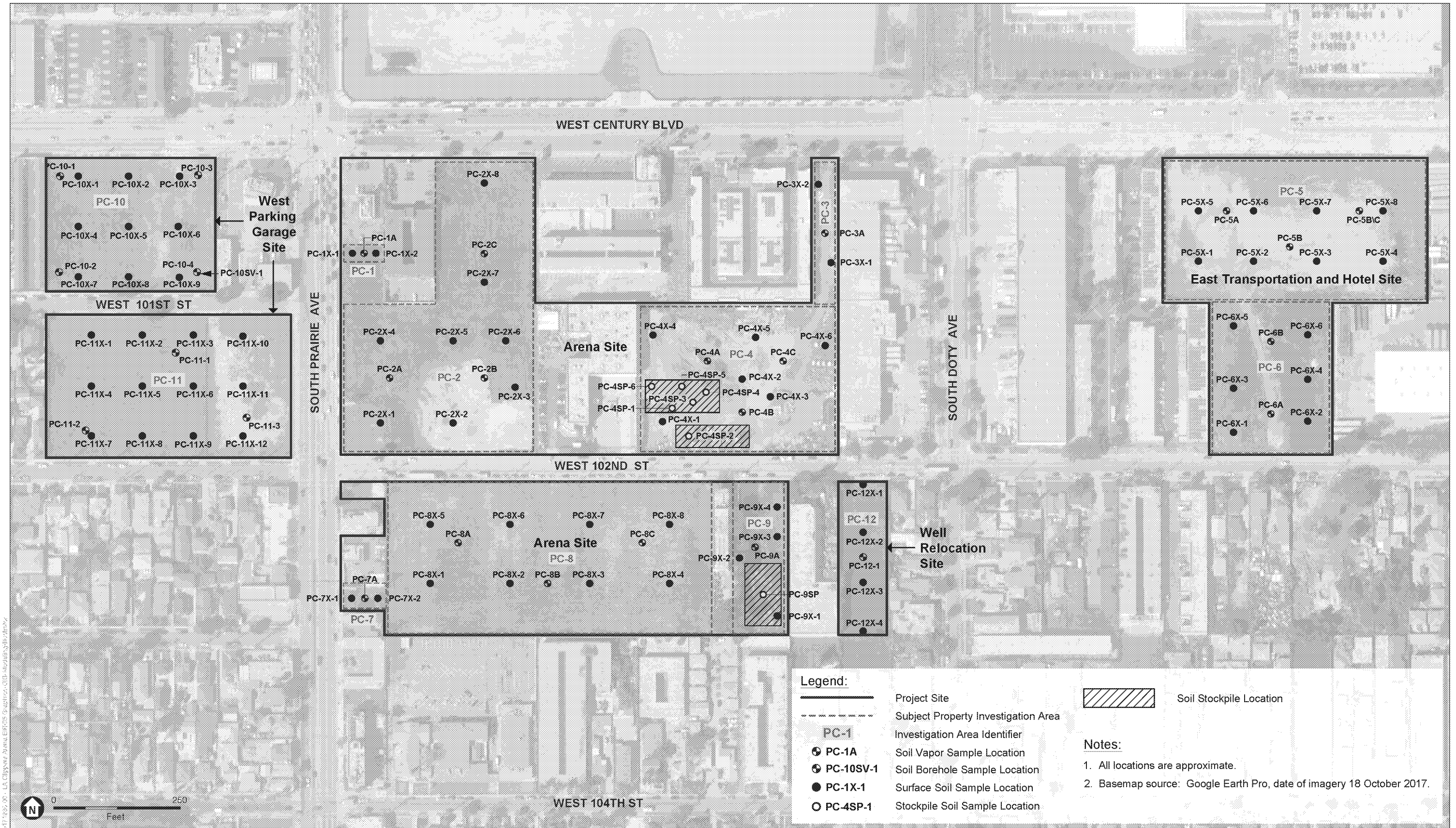
VOCs, PAHs, PCBs, organochlorine pesticides, organophosphorus pesticides, and chlorinated herbicides were not detected above the respective HERO Note 3-modified RSLs for residential land use.

²⁰ Arsenic levels were compared to DTSC background concentrations for Southern California. DTSC calculated an upper bound of 12 mg/kg as an appropriate threshold for determining any presence of arsenic above background for school sites in Southern California (DTSC, 2008 as cited in the EKI technical memorandum). Arsenic was not detected above the DTSC concentration of 12 mg/kg in any of the soil samples analyzed.

²¹ The reporting limit (i.e., the lowest level that can be confidently reported) for hexavalent chromium from the analytical laboratory is actually above the HERO Note 3-modified RSL for residential land use of 0.3 mg/kg, however, the method detection limit (i.e., the lowest level the laboratory equipment can quantify but not confirm so it becomes an estimate) provided by the laboratory is lower than 0.3 mg/kg, and no estimated detections of hexavalent chromium between the reporting limit and the method detection limit are reported by the laboratory.

²² EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 4.

²³ In accordance with standard laboratory procedures for QA/QC, a method blank which is an analyte free matrix, is carried through the complete preparation and analytical procedure. The method blank is used to evaluate contamination resulting from the complete preparation and analytical procedure.



SOURCE: EKI, 2017

Inglewood Basketball and Entertainment Center

Figure 3.8-2
Soil Sample Locations



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Schools and Daycare Centers

The public schools nearest to the Project Site (i.e., Arena Site, West Parking Garage Site, East Transportation and Hotel Site, or Well Relocation Site) are the Dolores Huerta Elementary School (4125 West 105th Street, Lennox) located approximately 620 feet (0.12 miles) to the southwest of the southwest corner of the Arena Site, and Morningside High School (10500 Yukon Avenue South, Inglewood,) located approximately 985 feet (0.19 miles) southeast of the East Transportation and Hotel Site. Both public schools are located within 0.25 miles of the Project Site.

In addition, an early childhood education use is located at 3937 West 104th Street, immediately adjacent to the southern boundary of the Arena Site, on the same property as the Inglewood Southside Christian Church.

There are no daycare centers located within 0.25 miles of the Project Site. The daycare center closest to the Project Site is the Daycare Family Lopez (4220 West 107th Street, Lennox), which is approximately 1,950 feet (0.37 miles) southwest of the southwest corner of the West Parking Garage Site.

Airports

The nearest public use airports to the Project Site include Los Angeles International Airport (LAX) and Jack Northrop Field/Hawthorne Municipal Airport (HHR). The Project Site is located approximately 2 miles east of LAX, along the extended centerlines of Runways 25R and 25L, and approximately 1.4 miles due north of Runway 7-25 at HHR. There are no private airstrips located in the vicinity of the Project Site.

The Project Site is located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP); it is not within the planning boundary or AIA for HHR. The planning boundary for LAX represents the combined areas around the airport subject to potential noise impacts and safety hazards associated with airport operations. The ALUP provides noise and safety policies governing development of compatible future land uses in areas around LAX. The Project Site is located within the CNEL 65 dB contour established for LAX in the ALUP, but is not located within the CNEL 65 dB contour for HHR. As a result of its exposure to noise from LAX, the Proposed Project is subject to the noise policies in the ALUP.

Wildland Fire

The City of Inglewood is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the Project Site is located in an incorporated city that is considered

to be Non-Very High Fire Hazard Safety Zone (non-VHFHSZ).²⁴ The City is responsible for fire protection in the area, which is implemented in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City of Inglewood Fire Department (see Section 3.13, Public Services).

3.8.2 Adjusted Baseline Environmental Setting

Section 3.8, Hazards and Hazardous Materials, assumes the Adjusted Baseline Environmental Setting as described in Section 3.0, Introduction to the Analysis. The HPSP Adjusted Baseline projects that will be constructed immediately northeast of the intersection of West Century Boulevard and South Prairie Avenue are expected to include the use, storage, and disposal of hazardous materials. Construction of these improvements will not likely have any direct effect on the hazards and hazardous materials associated with the Proposed Project, as the improvements being constructed would be expected to have only site-specific hazard issues.

As described in the SMP that is being implemented as part of construction for the NFL Stadium and other HPSP Adjusted Baseline projects, following completion of construction, no known areas of the NFL Stadium site would contain contaminants of potential concern that are above the criteria set in the SMP.²⁵ Remediation has or will occur during grading and site preparation activities. The regulatory oversight required for these types of remediation activities would be required prior to completion of construction and would require that no potential for off-site migration could adversely affect down-gradient locations, including the Project Site. Also, the HPSP Adjusted Baseline projects will not be associated with substantive routine emissions of hazardous materials or wastes and any incidents such as accidental and upset conditions would likely be isolated and localized events. Therefore, while the amount of hazardous materials being transported, stored, handled and disposed of with these new land uses will increase, they would not substantively alter the analysis for the Proposed Project under current existing conditions.

3.8.3 Regulatory Setting

Federal

The primary federal agencies with responsibility for hazards and hazardous materials management include the US EPA, US Department of Labor Occupational Safety and Health Administration (Fed/OSHA), and the US Department of Transportation (US DOT). Federal laws, regulations, and responsible agencies are summarized in **Table 3.8-1**.

²⁴ California Department of Forestry and Fire Protection, 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County. September. Accessed January 17, 2019.

²⁵ Erler & Kalinowski, Incorporated, 2007. *Soil Management Plan*, July 3, 2007, p. 1-1.

**TABLE 3.8-1
 FEDERAL LAWS AND REGULATIONS RELATED TO HAZARDS AND HAZARDOUS MATERIALS MANAGEMENT**

Classification	Federal Law or Responsible Federal Agency	Description
Federal Aviation	FAA	The FAA's primary role is to promote aviation safety and control the use of airspace. Federal regulations and FAA Advisory Circulars applicable to compatible land use and/or safety include, but are not limited to, 14 Code of Federal Regulations Part 77 (14 CFR Part 77), Safe, Efficient Use, and Preservation of the Navigable Airspace; FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or near Airports; and FAA Order 5200.5A, Waste Disposal Sites on or near Airports.
Hazardous Waste Handling	Resource Conservation and Recovery Act of 1976 (RCRA)	Under RCRA, the US EPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste from "cradle to grave."
	Hazardous and Solid Waste Act	Amended RCRA in 1984, affirming and extending the "cradle to grave" system of regulating hazardous wastes. The amendments specifically prohibit the use of certain techniques for the disposal of some hazardous wastes.
	Toxic Substances Control Act	Code of Federal Regulations Title 40 Chapter 1, Subchapter R – Toxic Substances Control Act – Part 761 Polychlorinated Biphenyls (PCBs) – covers the identification and sampling requirements for PCBs for disposal purposes.
Hazardous Materials Management	Community Right-to-Know Act of 1986 (also known as Title III of the Superfund Amendments and Reauthorization Act (SARA))	Imposes requirements to ensure that hazardous materials are properly handled, used, stored, and disposed of and to prevent or mitigate injury to human health or the environment in the event that such materials are accidentally released.
Hazardous Materials Transportation	US DOT	US DOT has the regulatory responsibility for the safe transportation of hazardous materials. The US DOT regulations govern all means of transportation except packages shipped by mail (49 CFR).
	US Postal Service (USPS)	USPS regulations govern the transportation of hazardous materials shipped by mail.
Occupational Safety	Occupational Safety and Health Act of 1970	Fed/OSHA sets standards for safe workplaces and work practices, including the reporting of accidents and occupational injuries (29 CFR).
Structural and Building Components (lead-based paint, polychlorinated biphenyls, and asbestos)	Toxic Substances Control Act	Regulates the use and management of PCBs in electrical equipment, and sets forth detailed safeguards to be followed during the disposal of such items.
	US EPA	The US EPA monitors and regulates hazardous materials used in structural and building components and their effects on human health.

State and local agencies often have either parallel or more stringent rules than federal agencies. In most cases, state law mirrors or overlaps federal law and enforcement of these laws is the responsibility of the state or of a local agency to which enforcement powers are delegated. For these reasons, the requirements of federal law and its enforcement are discussed under either the state or local agency section.

Federal Aviation Regulations Part 77 Safe, Efficient Use and Preservation of the Navigable Airspace

In fulfilling its role in managing the nation's airspace, the FAA regulates objects with the potential to affect navigable airspace. This is accomplished through evaluation of certain projects to determine whether they are hazards to air navigation. For both public use airports in the vicinity of the Proposed Project, Federal Aviation Regulations (FAR) Part 77 Safe, Efficient Use and Preservation of the Navigable Airspace (14 Code of Federal Regulations Part 77)²⁶ establishes notification criteria and defines various airport imaginary surfaces²⁷ for the operating environments (airspace) surrounding the airport. Part 77 stipulates that any proposed construction or alteration that is more than 200 feet above ground level (AGL) at its site, or that would exceed the established imaginary surfaces of an airport triggers a requirement to notify the FAA through its Obstacle Evaluation/Airport Airspace Analysis (OE/AAA) system or by filing Form 7460-1, "Notice of Proposed Construction or Alteration," (Form 7460-1), often referred to as a 7460-1 application. This notification prompts the FAA to conduct an aeronautical study to determine whether a project would constitute a hazard to air navigation. During such an aeronautical study, the FAA would evaluate the potential of a project to impact air traffic operations at both airports as well as nearby communication, navigation, and surveillance systems. Furthermore, the ALUP includes policies requiring compliance with Part 77.

Part 77 includes a large number of criteria that protect the airspace around an airport. The most relevant of these to the Project Site include notification criteria, horizontal imaginary surface criteria, and obstacle clearance surface criteria, each of which is discussed below.

Notification Criteria

Under Part 77 notification criteria are triggered by any permanent or temporary construction or alteration that is more than 200 feet AGL at its site or that exceeds imaginary surfaces associated with runways at public-use or military-use airports, or any airport with an FAA-approved instrument approach procedure. The size and slope of the imaginary notification surfaces for an airport are directly related to the length of the longest runway at that airport. Exceedance of any notification criterion triggers a requirement to file notice of construction with the FAA by filing a Form 7460-1. Once the FAA receives a Form 7460-1 application it conducts an aeronautical study to ensure that the construction or alteration would not result in an adverse effect on the safety and efficiency of air navigation.

Imaginary Surfaces

The FAA uses level and sloping imaginary surfaces delineated around airports to determine if proposed structures would represent an obstruction to air navigation (for public use airports, see 14 CFR Part 77.19). If a project would penetrate the imaginary airspace surfaces defined for an

²⁶ Federal Aviation Administration, 2010. 14 Code of Federal Regulations Part 77 *Safe, Efficient, Use and Preservation of the Navigable Airspace*, Federal Register Volume 75, Number 139, July 21, 2010.

²⁷ This federal regulation establishes five different imaginary surfaces (primary, approach, transitional, horizontal, and conical) for each runway to protect the ability for aircraft to safely fly into and out of the airport. These surfaces are incorporated as part of the Los Angeles County ALUP.

airport it is automatically assumed by the FAA to be an obstruction. The imaginary airspace surfaces around civil airports include primary surfaces (ground level, immediately surrounding the runways), horizontal surfaces (a horizontal plane 150 feet above the established airport elevation extending out to a maximum of 10,000 feet from above the end of the primary surface), conical surfaces (extending upward from the periphery of the horizontal surface [150 feet above airport elevation] for 4,000 feet at a slope of 20 to 1), approach surfaces (extending upward and outward from the end of the primary surface along the runway centerline), and transitional surfaces (extending from the primary surfaces to the horizontal and approach surfaces at a slope of seven to one).

At the Project Site, the height of the HHR imaginary surface ranges from 137 to 148 feet above median sea level (AMSL). Any temporary or permanent object that penetrates the horizontal surface requires notification to the FAA through the Form 7460-1 process, described above. Any proposed structures that exceed a 14 CFR Part 77 imaginary surface will require marking and lighting in accordance with FAA requirements. This requirement, however, does not automatically result in a Determination of Hazard by the FAA.

Obstacle Clearance Surfaces

The FAA has also established obstruction standards for determining whether objects, temporary (e.g., construction cranes) or permanent (e.g., buildings, trees, flagpoles, power poles, antennae), would constitute obstructions in the airspace. An obstacle clearance surface is established for every approach and departure flight path and procedure. The lowest obstacle clearance surfaces overlying the Project Site are associated with the LAX Localizer Approach to Runway 25L. This instrument approach procedure provides course guidance, and minimum altitudes, for aircraft to descend towards the southernmost runway. The associated obstacle clearance surfaces, or height constraints, associated with LAX Localized Approach to Runway 25L over the Project Site range from 290 to 450 feet AMSL from west to east.

If required, an FAA aeronautical study would evaluate the potential for impacting visual flight rules (VFR) or instrument flight rules (IFR) air traffic operations. This study would include analyzing various segments of airspace that overlie the Project Site. Examples include instrument departures and approaches, usable VFR traffic pattern airspace, diverse vector areas (DVA), visual glideslope indicators (VGSI), minimum vectoring altitudes (MVA), and low altitude en-route airways. Each of these segments of airspace have differing level or sloping obstacle clearance surfaces to ensure the appropriate clearance between the aircraft and terrain or other obstacles.

State

California Environmental Protection Agency and Unified Program

California's Secretary for Environmental Protection has established a unified hazardous waste and hazardous materials management regulatory program (Unified Program) as required by Senate Bill 1082 (1993).

The California Environmental Protection Agency (Cal/EPA) oversees the implementation of the Unified Program. The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspection and enforcement activities of six environmental and emergency response programs. The state agencies responsible for these programs set the standards for their respective programs while local governments implement the standards.

The Unified Program is implemented at the local level by 86 government agencies certified by the Secretary of Cal/EPA. These Certified Unified Program Agencies (CUPAs) have typically been established as a function of a local environment health or fire agency. Some CUPAs also have contractual agreements with one or more other local agencies called “participating agencies (PAs),” which implement one or more program elements, under the oversight of the CUPA.

The state agency partners involved in the Unified Program have the responsibility of setting program element standards, working with Cal/EPA on ensuring program consistency and providing technical assistance to the CUPAs and PAs. The following state agencies are involved with the Unified Program:

- **California Environmental Protection Agency (Cal/EPA).** The Secretary of Cal/EPA is directly responsible for coordinating the administration of the Unified Program. The Secretary certifies Unified Program Agencies. The Secretary has certified 86 CUPAs to date. These 86 CUPAs carry out the responsibilities previously handled by approximately 1,300 state and local agencies.
- **Department of Toxic Substances Control (DTSC).** The Department of Toxic Substances Control provides technical assistance and evaluation for the hazardous waste generator program including on-site treatment (tiered permitting).
- **Governor’s Office of Emergency Services (OES).** The Governor’s Office of Emergency Services is responsible for providing technical assistance and evaluation of the Hazardous Material Release Response Plan (Business Plan) Program, the California Accidental Release Response Plan (CalARP) Programs, and carrying out FEMA requirements to prepare the State Multi-Hazard Mitigation Plan also known as the State Hazard Mitigation Program.
- **Office of the State Fire Marshal (OSFM).** The Office of the State Fire Marshal is responsible for ensuring the implementation of the Aboveground Petroleum Storage Act (APSA). They are also responsible for oversight of the Hazardous Material Management Plans and the Hazardous Material Inventory Statement Programs. These programs tie in closely with the Business Plan Program.
- **State Water Resources Control Board (SWRCB).** The SWRCB provides technical assistance and evaluation for the UST program.

Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.), which is implemented by regulations described in CCR Title 22, Social Security, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste. This act implements the RCRA “cradle-to-grave” waste management system in California, but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, transportation

and permitting requirements, as well as in its penalties for violations. The act also exceeds federal requirements by mandating the recycling of certain wastes, requiring certain generators to document a hazardous waste source reduction plan, requiring permitting for federally exempt treatment of hazardous wastes by generators, and implementing stricter regulation of hazardous waste facilities.

California Department of Industrial Relations, Division of Occupational Safety and Health Administration

The California Department of Industrial Relations, Division of Occupational Safety and Health Administration (Cal/OSHA), assumes primary responsibility for developing and enforcing workplace safety regulations within the state. Cal/OSHA standards are more stringent than federal OSHA regulations, and are presented in CCR Title 8. Standards for workers dealing with hazardous materials include practices for all industries (General Industry Safety Orders); specific practices are described for construction and hazardous waste operations and emergency response. Cal/OSHA conducts on-site evaluations and issues notices of violation to enforce necessary improvements to health and safety practices. CCR Title 8 also includes standards for the identification, abatement, and handling of asbestos containing materials (8 CCR 1529 and 5208) and LBP (8 CCR 1532.1).

California Highway Patrol and Department of Transportation

The California Highway Patrol and California Department of Transportation (Caltrans) are the enforcement agencies responsible for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations. California Vehicle Code Division 13, Chapter 5, Article 1, sections 31303–31309, regulates the transport of hazardous materials. The provisions of this section apply to the highway transportation of hazardous materials and hazardous waste and include restrictions on labeling/placards, transportation routes, and other measures to ensure safe transport of regulated materials.

State Water Resources Control Board

The SWRCB has primary responsibility to protect water quality and supply through the respective RWQCBs. As described in Section 3.9, Hydrology and Water Quality, RWQCBs are authorized by the Porter-Cologne Water Quality Control Act of 1969 to protect the waters of the state. The RWQCBs provide oversight for sites where the quality of groundwater or surface waters is threatened. Extraction and disposal of contaminated groundwater due to investigation/remediation activities or due to dewatering during construction require a permit from the RWQCBs if the water were discharged to storm drains, surface water, or land.

CCR Title 23, Chapter 15, requires that non-hazardous liquid (greater than 42 gallons) or solid (greater than 10 cubic yards) waste must be reported to the RWQCB. Domestic wastewater and refuse releases are required to be reported under different non-Chapter 15 regulations.

California State Aeronautics Act

Public Utilities Code section 21001 et seq. is also known as the State Aeronautics Act, which is designed to further protect the public interest in aeronautics and aeronautical progress. Measures in the Act include:

- (a) Fostering and promoting safety in aeronautics.
- (b) Effecting uniformity of the laws and regulations relating to aeronautics consistent with federal aeronautics laws and regulations.
- (c) Developing, in cooperation with the private sector, airport management, local jurisdictions, federal authorities, and the general public, informational programs to increase the understanding of current air transportation issues including, but not limited to, aviation safety, planning, airport noise, airport development and management, and the role of aviation in the economic development of the state, as an integral part of the state's transportation system.

Article 2.7 of the Act addresses regulation of obstructions to airports and navigational facilities by outlining the notification requirements for different types of projects. For any new structures, such as those identified for the Proposed Project, Article 2.7 specifies that a permit from the California Division of Aeronautics must be obtained for any objects affecting the navigable airspace as defined in 14 CFR Part 77, which primarily relate to height. This permit is not required if the FAA has determined that the new construction does not constitute a hazard to air navigation.

California Fire Code

The 2016 California Fire Code is published by the California Building Standards Commission and incorporates by adoption the 2015 International Fire Code of the International Code Council. The California Fire Code is contained as Part 2 of the California Building Code and includes minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The City of Inglewood has adopted the California Fire Code with amendments.

Regional

Los Angeles County Airport Land Use Plan

Pursuant to California Public Utilities Code sections 21670–21679.5, with certain exceptions, each county in California with a public use airport is required to establish an Airport Land Use Commission (ALUC). The Los Angeles County Regional Planning Commission acts as the ALUC for Los Angeles County. The ALUC's purpose is to coordinate land use planning in areas around airports to provide for future development of the airport while protecting the public health, safety and welfare. To further this purpose, each ALUC must develop a compatible land use plan that promotes and ensures compatibility between airports and surrounding land uses. The Los Angeles ALUP was adopted on December 19, 1991 (revised December 2004), and includes policies applicable to future land uses in areas around the County's airports, as well as delineating the planning boundaries/AIAs in which these policies are applicable. This purpose is further

achieved through ALUC review of proposed development within the planning boundaries/AIAs to ensure consistency with the Los Angeles County ALUP. The following policies from the Los Angeles County ALUP are applicable to the Proposed Project:

Policies Related to Safety:

Policy G-4: Prohibit any uses which will negatively affect safe navigation.

Policy S-5: Prohibit uses which would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation.

Policy S-6: Prohibit uses which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

Policy S-7: Comply with the height restriction standards and procedures set forth in 14 CFR Part 77.

South Coast Air Quality Management District and Rule 1403

Asbestos is a carcinogen and is categorized as a hazardous air pollutant by US EPA. The EPA has delegated the authority to enforce the federal asbestos regulations to the South Coast Air Quality Management District (SCAQMD). Air Quality Management District Rule 1403, adopted by SCAQMD on October 6, 1989, establishes survey, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities.

Local

County of Los Angeles Health Hazardous Materials Division

In 1982, the Los Angeles County Board of Supervisors established the Hazardous Materials Control Program in the Department of Health Services for the inspection of businesses generating hazardous waste. In 1991, the program merged into the Fire Department and it became the Health Hazardous Materials Division (HHMD). All Hazardous Material Specialists are sworn and badged Los Angeles County Deputy Health Officers.

In 1997, the HHMD became a CUPA to administer the following programs within Los Angeles County: the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program (also referred to as Hazardous Materials Business Plans [HMBPs]), the California Accidental Release Prevention Program, the Aboveground Storage Tank Program, and the UST Program. The HHMD is a division of the Department's Prevention Services Bureau, and includes the following sections and units:

- Inspection Section,
- Emergency Operations Section,
- Special Operations Section, and
- Administration/Planning Section.

HMBPs are required for any facility that will handle a hazardous material or a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is equal to, or greater than, 55 gallons for materials that are liquids, 500 pounds for solids, or 200 cubic feet for compressed gas, as defined in subdivision (i) of section 25501 of the California Code (Health and Safety Code Division 20, Chapter 6.95, Article 1, Business and Area Plans [25500–25519]). Other requirements include submitting a chemical inventory information sheet pursuant to section 11022 of Title 42 of the United States Code. As the CUPA agency, HMMD would be responsible for ensuring compliance with these regulations.

City of Inglewood General Plan

The Safety Element of the Inglewood General Plan was adopted in July 1995. The following policies are articulated as “mitigation measures” in the City of Inglewood General Plan Safety Element and are relevant to Hazards and Hazardous Materials.

Safety Element

- Enforcement of the State law that requires businesses involved with hazardous materials to disclose the quantities of hazardous materials, their locations, their disposal and a management plan designed to decrease risks to the public.
- Private businesses and government agencies must continue to update and prepare the proper emergency responses in the event of a spill or explosion.
- The City must have continuous coordination among its staff (e.g., Planning Division, Fire Department, etc.) to ensure that hazardous material operations are located in zones and facilities that are appropriate and safe for such use.
- The City must ensure that these uses are located safe distances from residences, schools, hospitals, large assemblages of people, etc.

The Proposed Project would be consistent with these policies through the reparation and implementation of a HMBP (see discussion above under County of Los Angeles HMMD), which would ensure that the storage, handling, and disposal of hazardous materials is done in accordance with practices that minimize exposure and inadvertent releases.

City of Inglewood Multi-Hazard Mitigation Plan

The Office of Emergency Services (OES) achieves its mission of preparing for emergencies and disasters by serving the City of Inglewood through effective collaboration in preparing for, protecting against, responding to, recovering from, and mitigating the impacts of all hazards and threats. The City has an Emergency Plan (City of Inglewood Multi-hazard Mitigation Plan [MHMP]), which is in the process of being updated at the time of preparation of this section.²⁸ The existing 2010 MHMP generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among city

²⁸ City of Inglewood, *Emergency Preparedness*, http://v1.cityofinglewood.org/depts/admin/emergency_preparedness.asp. Accessed December 28, 2018.

departments to address natural and man-made hazards for all past, existing, and future development. The current MHMP includes the following overall hazard mitigation goals:

- Minimize the loss of life and property from natural hazard events
- Protect public health and safety
- Increase public awareness of risk from natural hazards
- Enhance emergency services including warning systems

3.8.4 Analysis, Impacts and Mitigation

Significance Criteria

The City has not adopted thresholds of significance for the analysis of impacts to hazards and hazardous materials. The following thresholds of significance have been adapted from CEQA Guidelines Appendix G. A significant impact would occur if the Proposed Project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area or create a hazard to navigable airspace and/or operations at a public airport;
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Methodology and Assumptions

Hazardous Materials Impacts

The potential for the creation of significant impacts related to hazards and/or hazardous materials through construction and operation of the Proposed Project were determined by a review of the existing conditions, with particular attention paid to the known or potential presence of hazardous materials and hazardous wastes associated with past operations on properties on the Project Site and nearby vicinity. Because regulatory requirements have evolved over time, and the regulations related to handling and disposal of hazardous materials have become increasingly stringent, it is reasonably understood that land uses that operated prior to the creation of the current regulatory

regime have a greater likelihood to have resulted in release of hazardous materials, if such materials were associated with the past use, than land uses that have operated only in recent years. Thus, the identification of past land uses is a key element of the evaluation process.

Exposure risks are affected by a variety of factors such as the chemical of concern, concentration level, medium (i.e., soil, groundwater, or soil vapor), and/or exposure pathway. Exposure can occur through direct physical contact as a result of disturbance from earthwork activities during demolition, excavation, or construction. Exposure can also take place through inhalation of off-gassing constituents (e.g., VOCs) that may be present in the soil or groundwater exposed during construction, or during project operations from vapor intrusion of gasses that can seep through foundations into new structures where people are present. This analysis relies on the select soil sampling that was conducted as part of the two EKI technical memorandums to characterize the existing subsurface conditions at the Project Site (see below). Where site-specific data is either limited or unavailable, this analysis makes conservative assumptions regarding the potential for encountering legacy contaminants.

Human health risks can occur from either acute or chronic exposure to subsurface contamination, and both are considered in this analysis. In order to quantitatively estimate exposure risks, a human health impact analysis or health risk assessment is necessary. A risk assessment of this type is typically conducted as part of the regulatory oversight of sites with known past releases of hazardous materials. Because none of the areas within the Project Site are currently under regulatory oversight, no such risk assessments have been conducted.

The EKI technical memoranda, along with publicly available resources, including existing environmental databases, were reviewed in order to determine the potential for hazardous impacts that would occur from the construction and/or operation of the Proposed Project. The EKI technical memoranda identified known hazardous materials sites that are near, but not on the Project Site, some of which are under regulatory oversight. The status of the investigation and cleanup of these sites is described above, and it is recognized that the status will change over time as these sites progress through the regulatory oversight process (i.e., complete characterization of extent of contamination and/or remediation to the point of no further threat to human health or the environment remaining). Because local and state agencies are reasonably expected to continue to enforce applicable requirements, compliance with applicable federal, State, and local health and safety laws and regulations by land owners and businesses in the area, including the project applicant in the event that hazardous materials are discovered during the excavation and construction of the Proposed Project, is assumed in this analysis.

The EKI technical memoranda also included a description of the soil sampling that was performed on the Project Site. The samples were submitted to a certified laboratory for analysis. The sampling results were compared to the US EPA RSLs for residential and commercial/industrial land uses, as modified by DTSC HERO Note 3. These screening levels are referred to as the “HERO Note 3-modified RSLs” and are not considered to be cleanup threshold concentrations, but screening levels that are intended to be a health-conservative preliminary

evaluation of potential risk and hazard based on planned land uses. The HERO Note 3-modified RSLs are less restrictive for commercial/industrial land uses compared to residential, since residential land uses tend to result in higher levels of exposure and associated health risk than for commercial/industrial land uses.

The analysis of potential impacts related to legacy contaminants relies on these sampling results because they are considered to be the best available representation of existing subsurface conditions. The use of the HERO Note 3-modified RSLs provide a conservative approach to evaluate potential health risks from implementation of the Proposed Project, recognizing that residential land uses are not proposed. As a result, screening levels for commercial/industrial land uses were also provided along with the residential levels for comparison.

Airport-Related Hazards

In order to evaluate the potential for the Proposed Project to result in the creation of airspace hazards, CAG prepared a comprehensive obstruction evaluation and airspace analysis for the Proposed Project in September 2017. This analysis was updated by CAG in May 2019, to include the most current heights identified for the temporary construction equipment and permanent structures included in the Proposed Project.²⁹ ESA aviation and airport planners conducted a peer review of the CAG analysis, and concluded that the analysis is accurate and objective, and appropriate for inclusion in this Draft EIR.

The results of the CAG analysis indicate that the Proposed Project construction cranes could trigger the 200-foot AGL notification criteria, and that temporary construction equipment and the proposed Arena Structure could penetrate the approximate 125-foot AGL (215-foot AMSL) 14 CFR Part 77.19 imaginary airspace horizontal surface for HHR. In addition, the CAG analysis determined that temporary construction cranes used as part of the construction of the Proposed Project potentially could exceed slightly the 290-foot obstacle clearance surface for the final approach segment of the Localizer Approach to Runway 25L at LAX.

The CAG memoranda are included in Appendix P.

Issues Determined to be Less Than Significant

Upon review of the Proposed Project, the City of Inglewood determined that due to the physical characteristics of the Project Site and the Proposed Project, several environmental issues or resources would not be affected by the Proposed Project and need not be further considered in the

²⁹ Capitol Airspace Group, 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017, and Capitol Airspace Group, 2019. *IBEC Project A description of Aeronautical Study Process and Results of an Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, May 10, 2019.

Draft EIR.³⁰ The discussion below provides a brief statement of reasons for the City's determination that these issues do not warrant further consideration in the EIR.

With respect to significance criterion (7), as described under Environmental Setting, the Proposed Project is located in a developed urban area served by the City of Inglewood Fire Department and is not located within a very high or high fire hazard severity zone. The following discussion further addresses these criteria.

The Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The Project Site is located in a developed urban area served by the City of Inglewood Fire Department and is not located within a very high or high fire hazard severity zone. As such, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Thus, there would be **no impact** of the Proposed Project related to this significance criterion. Potential impacts associated with other fire-related services are discussed in Section 3.13, Public Services, of this EIR.

Impacts and Mitigation Measures

Impact 3.8-1: Construction and operation of the Proposed Project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant)

Construction

Project-related construction activities would include demolition and removal of existing buildings on the Project Site and use of hazardous materials during construction of new buildings, structures, and other features of the Proposed Project. The potential for exposure of the public or the environment to hazardous materials during these construction activities is addressed below.

Exposure to Hazards in Existing Buildings

The Proposed Project would include demolition of approximately 54,098 square feet of existing on-site vacant and commercial uses in structures of varying ages. Some structures within the Project Site were built prior to 1978 and, as a result, could contain hazardous building materials. Exposure to hazardous building materials during demolition, including ACMs, LBP, or PCBs, mercury and other hazardous materials in structures would only occur during demolition activities, but could result in adverse health effects if not managed appropriately as required by existing laws and regulations. Once the structures have been removed, there would be no further exposure during operation of the Proposed Project.

³⁰ Public Resources Code section 21003(e) states that “[t]o provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.”

As described under the Regulatory Setting, above, existing federal, State, and local regulations require demolition or renovation activities that may disturb or require the removal of materials that consist of, contain, or are coated with ACM, LBP, PCBs, mercury, and other hazardous materials to be inspected and/or tested for the presence of hazardous materials. Further, all hazardous materials must be managed and disposed of in accordance with laws and regulations described in the Regulatory Setting and further described below.

The identification, removal, and disposal of ACM is regulated under 8 CCR 1529 and 5208. The identification, removal and disposal of LBP is regulated under 8 CCR 1532.1. For both ACM and LBP, all work must be conducted by a State-certified professional. If ACM and/or LBP is determined to exist on site, a site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel (South Coast Air Management District for asbestos and Cal/OSHA for lead). If necessary, a State-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of PCBs, the identification, removal, and disposal is regulated by the EPA under the Toxic Substances Control Act (Title 40, Chapter 1, Subchapter R, Part 761) and California regulations (22 CCR 66263.44). Electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above action levels, the materials must be disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal is regulated under 22 CCR 67426.1–67428.1 and 66261.50. Under these regulations, the light tubes must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

Existing abatement laws and regulations, combined with enforcement mechanisms by agencies including SCAQMD, Cal/OSHA require compliance with applicable federal, State, and local laws and regulations that would prevent the exposure of individuals and the environment to the hazards during demolition of structures built before newer regulatory requirements were enacted (1978 for LBP and PCBs, 1981 for ACMs, and 2004 for mercury in fluorescent lighting). The Proposed Project would involve demolition and removal of structures of varying ages, the oldest being the

Rodeway Inn motel that dates back to the mid-1950s. Such structures could potentially contain hazardous building materials, however pursuant to federal, State, and local regulations, including HBMP programs overseen and enforced by the HHMD, the demolition permit process would require appropriate surveying, identification and disposal of any identified hazardous building materials. Therefore, exposure to asbestos containing materials, LBP and/or other hazardous building materials that would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be **less than significant**.

Use of Hazardous Materials during Construction

Construction activities would also likely require the use of limited quantities of hazardous materials such as fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These hazardous materials are typically packaged in consumer quantities and used in accordance with manufacturer recommendations, and would be transported to and from the Project Site. The improper handling and transport of hazardous materials could result in adverse health effects to workers or the public.

As discussed in the Regulatory Setting, transportation of hazardous materials is regulated by US DOT and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the exposure of hazardous materials. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials. As the CUPA agency, HHMD would be responsible for ensuring compliance with these regulations including, but not limited to, the Hazardous Waste Control Act, the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program, and the Aboveground Storage Tank Program.

As discussed above a comprehensive set of federal, State, and local laws and regulations regulate the transportation, management, and disposal of hazardous materials and wastes so as to reduce the potential risks of human exposure. For these reasons, the potential for construction of the Proposed Project to result in a significant hazard due to exposure of the public or the environment to hazardous materials or wastes to through the routine transport, use, or disposal of hazardous materials would be a **less-than-significant impact**.

Operation

The use of common hazardous materials would occur as part of the operation of the Proposed Project, primarily associated with maintenance activities as well as storage of diesel for the backup generator and biomedical supplies for the sports medicine clinic. Hazardous chemicals common in other commercial/retail/hotel and support settings include paints, lubricants, solvents, cleaning supplies and relatively small quantities of fuels, oils, and other petroleum-based products. Activities such as landscaping, can also become sources of releases of hazardous materials with pesticides and herbicides.

Because general arena and commercial/retail/hotel hazardous materials are typically handled and transported in small quantities, and because the health effects associated with them are generally not as serious as industrial uses, operation of a majority of the new uses at the site would not cause an adverse effect on the environment with respect to the routine transport, use, or disposal of general office and household hazardous materials.

The sports medicine clinic would likely include relatively small quantities of bio-hazards and other chemicals, such as medical supplies, oxygen tanks and other treatment supplies that fit the classification of a hazardous material or waste. In addition, any administration of medication hypodermically would produce bio-hazard waste. As part of adhering to local CUPA requirements, the clinic would be required to prepare and submit a Hazardous Materials Management Plan and HMBP to the County HHMD, as well as comply with any applicable fire code requirements as enforced by the City fire department.

For the arena and commercial/retail/hotel uses, the existing regulatory framework requires appropriate training of employees in the use, storage, and disposal of any hazardous materials and wastes. As required by the HHMD, any business that would store hazardous materials and/or waste at its site would be required to submit business information and hazardous materials inventory forms contained in Hazardous Materials Management Plan and HMBP. In addition, all hazardous materials handlers are subject to inspection every 3 years. The HHMD, as the CUPA, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, State, and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.), which is implemented by regulations described in CCR Title 22. With adherence to existing regulatory requirements, the impact of the routine transport, use or disposal of hazardous materials associated with future uses at the site would be a **less-than-significant impact**.

Mitigation Measures

None required.

Impact 3.8-2: Construction and operation of the Proposed Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)

Construction

As noted above in Impact 3.8-1, construction activities would require the use of limited quantities of hazardous materials that are normal requirements of the construction process, including fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These materials would be transported to and from the Project Site for use during construction activities. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials, thereby exposing the public or the environment to hazardous materials.

As discussed in the Regulatory Setting, the transport of hazardous materials is regulated by US DOT and Caltrans. The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and include provisions that restrict containment during highway transportation of hazardous materials and wastes.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the NPDES General Construction Permit. This permit requires implementation of best management practices (BMPs) that would include measures to address the safe handling of hazardous materials, and in the unlikely event of an inadvertent release, also requires spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Stormwater Pollution Prevention Plan (discussed further in Section 3.9, Hydrology and Water Quality) as required by the NPDES General Construction Permit would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved, and would be cleaned up in a timely manner in accordance with identified BMPs. See Impact 3.8-4 for a discussion of potential impacts related to encountering previously released (i.e., legacy contaminants) hazardous materials or wastes.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, such as the Proposed Project, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a **less-than-significant impact**.

Operation

Operation of the Proposed Project arena, hotel, and associated facilities would involve the use of relatively small quantities of common hazardous materials, including paints and thinners, cleaning solvents, and fuels, oils, and lubricants. For uses in the Proposed Project, these materials would be typically packaged in consumer quantities, as compared to bulk deliveries for industrial land uses, and used in accordance with manufacturer recommendations. Some limited quantities of bio-hazards and other chemicals could also be associated with the sports medicine clinic; these too would be managed pursuant to federal and State regulations of biomedical wastes.

The Proposed Project would include the storage of diesel for backup generators,³¹ which, if released, could cause adverse effects to the public and the environment. Pursuant to the provisions of programs administered by the Los Angeles County HHMD, storage of all hazardous materials on site, including the diesel fuel, would be required to adhere to facility-specific HMBPs. The preparation and implementation of facility-specific HMBPs would be required for the arena and hotel, and the HMBPs would identify safe measures to store, handle, and dispose of hazardous materials such that accident and upset conditions are minimized. The HMBPs would also include spill response measures to ensure that in the unlikely event that a release does occur, protocols would be implemented to contain and control any accidental release in a manner that is protective of human health and the environment. Such protocols could include employee training, the location of absorbent materials to contain a release, and notification requirements to ensure that human health and the environment is protected from any exposure. The adequacy of and compliance with the HMBPs would be overseen and enforced by the HHMD. Because a comprehensive set of enforced laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to the public and environment, this impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-3: Construction and operation of the Proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. (Less than Significant)

Construction

Construction of the Proposed Project would require use of limited quantities of hazardous materials, including fuels, oils and lubricants for construction equipment; paints and thinners; and solvents and cleaners. There are three existing schools that have been identified within 0.25 miles of the Project Site. Two of the schools are public schools operated by the Inglewood Unified

³¹ One exterior standby diesel engine generator located in the utility yard on the east side of the Arena Structure. Three additional generators would be provided for emergency power: one for the parking garage within the West Parking Garage Site, one for the hotel within the East Transportation and Hotel Site, and one for the retail, restaurant, and community space buildings within the plaza at the Arena Site.

School District: the Dolores Huerta Elementary School (4125 West 105th Street Lennox California), located approximately 620 feet (0.12 miles) from the southwest of the southwest corner of the Arena Site, and Morningside High School (10500 Yukon Avenue South), located approximately 985 feet (0.19 miles) southeast of the East Transportation and Hotel Site.³² In addition, as described under Environmental Setting, there is a publicly accessible Head Start and Early Head Start preschool operated by TRF and located at 3937 West 104th Street, immediately adjacent to the south of the Arena Site. There are no schools included as part of the Proposed Project, and there are no other new schools proposed within 0.25 miles of the Project Site.

Hazardous materials would be transported to and from the Project Site and could pass near these schools. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials near schools, thereby exposing school occupants to hazardous materials. However, as discussed in the Regulatory Setting (and also above in Impact 3.8-1), the transportation of hazardous materials is regulated by US DOT and Caltrans. Together, federal and State agencies establish driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release.

Businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials in accordance with the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.), which is implemented by regulations described in CCR Title 22. Finally, construction on sites larger than one acre would be required to comply with the Construction General Permit and implement a SWPPP and its associated BMPs to control and limit any releases of hazardous materials.

A comprehensive and enforced set of laws and regulations minimize the risks associated with the transportation and management of hazardous materials, as articulated in the Regulatory Setting. Because these laws and regulations would reduce potential hazards associated with construction of the Proposed Project to levels that minimize health risks, this impact would be **less than significant**.

Operation

Operation of the Proposed Project would involve the use of relatively small quantities of common hazardous materials including paints and thinners, cleaning solvents, fuels, oils, low risk medical wastes, and lubricants. The operation of the Proposed Project would not involve the types of hazardous emissions that are typical of industrial land uses and which require source regulation and permitting. Hazardous materials, including diesel fuel for backup generators and any medical materials or wastes, would be stored within appropriate storage containers in accordance with regulatory requirements, such as the Hazardous Waste Control Act. This would ensure that there would be no unregulated emissions of hazardous materials.

³² Inglewood Unified School District, 2018. *2018–2023 Strategic Plan*, updated November 2018.

As previously discussed, transportation of hazardous materials is regulated by US DOT and Caltrans, which together determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, and as discussed in the Regulatory Setting, all businesses in the Proposed Project that handle, generate, and dispose of hazardous materials would be required to prepare and implement facility-specific HMBPs under the auspices of the HHMD and in accordance with the Hazardous Waste Control Act (California Health and Safety Code section 25100 et seq.) pursuant to regulations contained in CCR Title 22. Compliance with these regulations ensure that hazardous materials on site are appropriately stored and handled and would not result in hazardous emissions. Because a comprehensive and enforced set of laws and regulations govern the transportation and management of hazardous materials so as to reduce the potential hazards to levels that minimize health risks, this impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-4: Construction and operation of the Proposed Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, could have the potential to create a significant hazard to the public or the environment. (Less than Significant with Mitigation)

As described above under Environmental Setting, the investigations that occurred in 2017 determined whether the Project Site and surrounding area contained sites listed on environmental databases that might indicate the potential presence of contamination in the subsurface.³³ The information from these databases include lists of properties that contain businesses that handle hazardous materials and/or wastes with no record of releases, properties with relatively minor incidents having little to no threat to human health or the environment, or properties with a history of extensive releases that require remediation efforts in order to get conditions to acceptable levels (i.e., no substantive threat to human health or the environment).

The EKI report determined that some parcels located within the Project Site were included on environmental databases that were searched by EDR, as described above in the Setting (i.e., Database Search Project Site).³⁴

Typically, sites with known previous releases that are included on these lists are either in the process of further investigation or are already undergoing remediation such that exposure hazards

³³ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019, p. 12.

³⁴ Previous Phase I Environmental Site Assessments covering portions of the Project Site were also reviewed and did not include any additional records showing the site to be included on any environmental databases. Ninyo & Moore, 2012. *Phase I Environmental Site Assessment, Site A, Between West Century Boulevard and West 101st Street, Inglewood, CA*, December 5, 2012. Ninyo & Moore, 2012. *Phase I Environmental Site Assessment, Site B, Between West 101st Street and West 102nd Street, Inglewood, CA*, December 5, 2012.

are reduced. Investigations and remediation are overseen by federal, State, and/or local regulatory agencies, such as the US EPA, California DTSC or the Los Angeles RWQCB. Agencies such as these review sites on a case by case basis and evaluate potential health hazards based on land uses, characteristics of the contaminants of concern, and exposure pathways.

While there are no known properties within the Project Site that are under active investigation or remediation, based on the historic uses on the Project Site the possibility exists for future improvements associated with the Proposed Project to disturb previously unidentified contamination. If not understood and managed appropriately, future visitors or workers at the Project Site could be exposed to legacy contaminants through contact with contaminated soils during excavation or other ground disturbing activities, or through future vapor intrusion into Proposed Project structures.

As described above, the EKI report determined that seven parcels located within the Arena Site were included on environmental databases that were searched by EDR.³⁵ In addition, a number of sites located up gradient or adjacent to the Project Site have documented use and/or releases of hazardous materials and/or wastes. EKI also collected surface soil samples from the Project Site in two separate efforts (2017 and 2019) to further determine the potential presence of legacy contaminants across the different areas of the Project Site.^{36,37}

The known past uses and likelihood of contamination on each part of the Project Site is discussed below:^{38,39}

Arena Site

The Arena Site includes various addresses (3900 and 3901 West 102nd Street, 10220 South Prairie Avenue, and 3822 West Century Boulevard) that were found in environmental databases reviewed by EKI. The Arena Site was occupied by residential properties and agricultural uses beginning in about 1923. The northwestern corner of the Arena Site (the current Church's Fried Chicken) once had an automobile service station and the property at 3822 West Century Boulevard was previously dry cleaner that may have used dry cleaning chemicals (not all dry cleaner facilities handle these chemicals).

To the north of the Arena Site, across West Century Boulevard, the former Hollywood Park Racetrack and Casino property also has potential to adversely affect the site if the documented releases at that site have migrated onto the Project Site. Groundwater monitoring of the racetrack

³⁵ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019a, p. 12.

³⁶ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Investigations*, Technical Memorandum, June 28, 2019, p. 20.

³⁷ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 3.

³⁸ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Investigations*, Technical Memorandum, June 28, 2019a, p. 22.

³⁹ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 5.

site was conducted in 2009 and did not indicate any substantive risks to human health or the environment. As a result, the wells were destroyed in 2014.

Soil samples collected on the Arena Site by EKI found that diesel-range TPH, chrome and also lead were detected at concentrations above the residential screening level (HERO Note 3-modified RSL), but below the screening level criteria for commercial/industrial land uses like those in the Proposed Project. The source of the TPH is unknown but the lead could be attributed to LBP from buildings previously located on the site.

Based on the land use history and results of soil sampling on the Arena Site, during demolition and excavation phases of construction workers could be exposed to diesel--range TPH, chrome, and lead which can have adverse health effects depending on exposure levels and length of exposure. This impact is considered **potentially significant**.

West Parking Garage Site

The land within the West Parking Garage Site was once used for agriculture before being developed with residential land uses in the 1920s and 1930s. Those residential uses were cleared in the 1990s and early 2000's pursuant to the City's participation in the FAA's noise mitigation grant program.

Nearby the West Parking Garage Site, from approximately 1970 to 1990 there was an automobile service station (former Unocal service station) located on southwestern corner of West Century Boulevard and South Prairie Avenue on a site currently occupied by a Starbucks café (see Figure 3.8-2). Further to the south on West 101st Street, just west of South Prairie Avenue, a dry cleaning facility was located immediately east of the West Parking Garage Site. Chemicals previously known to be used in dry cleaning processes commonly included VOCs PCE, TCE, and/or their byproducts like vinyl chloride, which can have adverse effects on human health. The past land uses of an automobile service station and a dry cleaning business suggest a relatively high probability of releases to the subsurface which may have adversely affected subsurface soil or groundwater.

Soil samples collected by EKI in 2019 on the West Parking Garage Site detected concentrations above the residential screening level (HERO Note 3-modified RSL) but below the screening level criteria for commercial/industrial land uses, of the following contaminants: hexavalent chromium in six of the seven samples analyzed from this area, thallium (a metal not found in nature) in one sample, and lead in two samples (analyzed with field equipment).⁴⁰ Hexavalent chromium was also detected in the method blank, suggesting that the results of the soil samples could have been affected by laboratory contamination.⁴¹ Two of the 21 soil samples analyzed using portable field equipment detected lead results above the residential screening level of 80 mg/kg (89 and

⁴⁰ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 4-5.

⁴¹ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 5.

126 mg/kg), but all were below the screening level criteria of 320 mg/kg for commercial/industrial land uses such as those that would be included in the Proposed Project.

The 2019 EKI report also evaluated contaminants of concern in the soil gas because of the former dry cleaning facility that was located adjacent to the West Parking Garage Site. A sample was analyzed for VOCs and also compared to residential screening levels. The analytical results of the sample were found to be below residential screening levels, which indicates that the soil or groundwater under the West Parking Garage Site was not adversely affected by the former dry cleaning facility operations.

Overall, analysis of the soils on the West Parking Garage Site detected levels of contaminants, including possibly hexavalent chromium, thallium, and lead, that are above residential screening levels but below commercial/industrial screening levels. Exposure of people or the environment to contaminated soils or groundwater could occur during construction of the Proposed West Parking Garage. For these reasons, the impact is considered **potentially significant**.

East Transportation and Hotel Site

The East Transportation and Hotel Site is currently undeveloped, but had a history of past residential, small scale agricultural, and hotel land uses. By 1989, all buildings had been demolished, and the site was cleared. There is no documented account of any release at the site; however, there is a potential to encounter legacy contaminants associated with the past uses. Soil sampling conducted by EKI in 2017 identified one sample in which diesel- and motor-oil-range TPH concentrations were above the residential HERO Note 3-modified RSLs, with the diesel-range concentration also above the screening level criteria for commercial/industrial land uses. While this detection is not necessarily an indication of any substantive presence of legacy contaminants, without additional investigation and potential remediation, the potential exists for workers during ground disturbing activities to be exposed to diesel- and motor-oil-range TPH above the HERO Note 3-modified RSL. Exposure of people or the environment to contaminated soils or groundwater could occur during construction of the Proposed East Transportation Hub and Hotel. For these reasons, the impact is considered **potentially significant**.

Well Relocation Site

The Well Relocation Site is located in approximately 100 feet east of the Arena Site, as well as other commercial and light industrial land uses. The database search for this site revealed one data entry connected with a hazardous waste manifest for transport of hazardous materials.⁴² The database entry is attributed to the Inglewood Redevelopment Agency and indicates that hazardous waste was transported from the Well Relocation Site.

Two soil samples were collected on the Well Relocation Site by EKI in 2019. In one sample taken from 0 to 1 foot bgs, chlordane (a pesticide compound) was detected at a concentration above the residential screening level (HERO Note 3-modified RSL), but below the

⁴² GeoSearch, 2018. *Preliminary Radius Report*. December 27, 2018, p. 21.

commercial/industrial screening level criteria.⁴³ In both samples analyzed hexavalent chromium was found above the residential screening level, but below commercial/industrial screening levels. Hexavalent chromium was also detected in the method blank, suggesting that the results of the soil samples could have been affected by laboratory contamination.⁴⁴

In light of the lack of any further details regarding the database entry for this site, the history of hazardous materials use for the immediate area and the detections of chlordane and hexavalent chromium, indicate the potential for legacy contaminants to be present on the Well Relocation Site. Exposure of people or the environment to contaminated soils or groundwater could occur during construction of the Proposed Replacement Well. This impact is considered **potentially significant**.

As described above, based on available information about past uses and existing levels of contaminants in soil samples analyzed from each part of the Project Site, the potential exists to create a significant hazard to the public or the environment as a result of exposure to existing contamination. This impact is potentially significant.

Mitigation Measure 3.8-4

Prior to initiating any ground disturbing activities on the Project Site, the project applicant shall prepare a Soil Management Plan (SMP) that is submitted and approved by the Los Angeles County Health Hazardous Materials Division (HHMD). The SMP shall be prepared by a Registered Environmental Assessor (REA) or other qualified expert, and shall address the findings of the two EKI technical memoranda dated June 28, 2019, and/or subsequent relevant studies.

During construction, the contractor shall implement the SMP. If unidentified or suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors, is encountered during site preparation or construction activities on any portion of the Project Site, work shall stop in the excavation area of potential contamination. Upon discovery of suspect soils or groundwater, the contractor shall notify the HHMD and retain an REA or qualified professional to collect soil samples to confirm the type and extent of contamination that may be present.

If contamination is confirmed to be present, any further ground disturbing activities within areas of identified or suspected contamination shall be conducted according to a site specific health and safety plan, prepared by a California state licensed professional. The contractor shall follow all procedural direction given by HHMD and in accordance with the SMP to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with transport laws and the requirements of the licensed receiving facility.

If contaminated soil or groundwater is encountered and identified constituents exceed human health risk levels, ground disturbing activities shall not recommence within the contaminated areas until remediation is complete and a “no further action” letter is obtained from the appropriate regulatory agency or direction is otherwise given that

⁴³ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 4-5.

⁴⁴ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019, p. 4.

construction can commence. The project applicant shall submit the “no further action” letter or equivalent notification to the City prior to resumption of any ground disturbing activity on the relevant portion of the Project Site.

Level of Significance After Mitigation: With the implementation of Mitigation Measure 3.8-4, the Proposed Project would not create a significant hazard to the public or the environment as a result of exposure to existing contamination or hazardous release sites. Thus, this impact would be considered **less than significant**.

Impact 3.8-5: Construction and operation of the Proposed Project would be located within an airport land use plan area and could result in a safety hazard or excessive noise for people residing or working in the project area or could create a hazard to navigable airspace and/or operations at a public airport. (Less than Significant with Mitigation)

Excessive Noise Exposure

The Project Site is located within the Planning Boundary/AIA for LAX as designated within the ALUP. The Planning Boundary/AIA is based in part on the 65 dB CNEL contour included in the ALUP, as shown in Figure 2-4 in Chapter 2, Project Description. Parts of the Project Site located between West 102nd Street and West Century Boulevard are generally located in areas exposed to CNEL 65 to 70 dB in the ALUP CNEL contour. This includes both the West and East Parking Garage sites, the Plaza area, the Employee Entry Pavilion, the Hotel, and part of the Arena and Practice and Athletic Training Facility, Office, and Sports Medicine Clinic. Parts of the Project Site south of West 102nd Street are generally located in areas exposed to CNEL 70 to 75 dB in the ALUP CNEL contour. This includes part of the Arena and Practice and Athletic Training Facility, Office, and Sports Medicine Clinic, as well as the Parking Structure south of the Arena.

Pursuant to ALUP Policies G-1 and N-3, the compatibility of proposed land uses is determined by consulting the land use compatibility table provided in Section V of the ALUP. The land use compatibility table identifies land use by category, including residential, commercial, and industrial land use. The Proposed Project components would all generally fall within the commercial and recreational land use categories. The compatibility criteria provided in the land use compatibility table is the same for both commercial and recreational land uses. The compatibility criteria require that commercial and recreational land uses located in areas exposed to noise levels of CNEL 65 to 75 dB must be reviewed for noise insulation needs. Noise insulation is unlikely to be required for elements of the Proposed Project that are not considered noise sensitive, including the Arena outdoor plaza areas, the West Parking Garage, or the East Transportation Hub and Parking Garage. Standard building construction practices for the commercial structures in the Plaza area and for the Hotel would typically reduce interior noise levels to acceptable levels although some level of additional insulation may be appropriate, especially for the proposed hotel use. With such actions typically undertaken in the design and building inspection process, the Proposed Project would comply with ALUP Policies G-1 and N-3, and would not expose people residing (staying in the hotel), working in the project area, or attending events in the Arena to excessive noise levels.

Safety Hazards/Hazards to Air Navigation

As discussed under Methodology, above, an obstruction evaluation and airspace analysis for the Proposed Project was conducted by CAG in September 2017, followed by an update in May 2019.⁴⁵ The purpose of the CAG evaluations were to identify whether temporary or permanent structures associated with construction and/or operation of the Proposed Project would create a hazard to air navigation. The CAG evaluations are included in this Draft EIR as Appendix P.

The results of the CAG evaluations indicate that the Proposed Project could exceed three criteria that require notification of, and evaluation by, the FAA. More specifically, (1) the Proposed Project construction cranes could exceed the 200-foot AGL notification criteria, (2) temporary construction cranes and the Arena Structure would penetrate the 14 CFR Part 77.19 imaginary airspace horizontal surface for HHR, and (3) although the Proposed Project construction cranes are planned to be no greater than 290 feet AMSL, some cranes involved in arena construction could temporarily exceed slightly the 290 feet AMSL obstacle clearance surface for the final approach segment of the Localizer Approach to Runway 25L at LAX. Each of these exceedances is discussed further below. None of the construction equipment for other project structures, including the Plaza retail and community buildings, West Parking Garage, East Transportation Hub and Parking Structure, Hotel, and Replacement Well would exceed the imaginary airspace surfaces for either HHR or LAX.

Notification Surfaces

As discussed above, the FAA requires notification of proposed temporary or permanent structures that could exceed 200 feet AGL, as well as those that could exceed imaginary surfaces associated with runways at public-use or military-use airports, or any airport with an FAA approved instrument approach procedure. The size and slope of the imaginary notification surfaces for an airport are directly related to the length of the longest runway at that airport.

Pursuant to section 77.9(b)(1), the HHR notification surface is the lowest notification surface overlying the Project Site, ranging from 137 to 148 feet AMSL where it overlies the Project Site. At up to 150-foot AGL, the proposed Arena Structure would exceed this surface and require notification to the FAA. In addition, the construction cranes for the proposed Arena Structure are planned to reach up to 290 feet AMSL, but could potentially exceed that height slightly, and thus these features would exceed the notification surface.

HHR Horizontal Surface

At up to 150 feet AGL, the proposed Arena Structure would exceed HHR imaginary horizontal surface at the Project Site. As described above, because the Arena Structure construction cranes are anticipated to reach up to 200 feet AGL (approximately 290 feet AMSL), but could potentially exceed that height slightly during operation of the equipment, the temporary construction equipment would also exceed HHR imaginary horizontal surface. According to the

⁴⁵ Capitol Airspace Group, 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017, and Capitol Airspace Group, 2019. *IBEC Project A description of Aeronautical Study Process and Results of an Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, May 10, 2019.

CAG analysis included in Appendix P, the proposed Arena Structure and associated construction cranes that exceed these surfaces would be identified as obstructions. As a result, the FAA would conduct further study and would require marking and lighting on these structures. Exceeding an imaginary surface, however, would not automatically trigger a Determination of Hazard. Proposed structures that remain below established obstacle clearance surfaces, or are deemed to not affect a significant volume of operations, can receive a Determinations of No Hazard.

LAX Obstacle Clearance Surface

The minimum descent altitude for instrument approaches in the final stepdown segment for LAX Runway 25L is 540 feet AMSL; the resulting lowest obstacle clearance surface is 290 feet AMSL. At 150 feet AGL, the proposed Arena Structure would be well below the 290-foot AMSL obstacle clearance surface. The temporary construction cranes are anticipated to reach up to 200 feet AGL (290 feet AMSL), but could potentially exceed slightly that height, and thus could exceed this obstacle clearance surface. According to the CAG evaluation included in Appendix P, the temporary construction cranes that would potentially exceed the obstacle clearance surface could require a temporary increase to instrument approach procedure minimum descent altitudes, to be determined as part of the FAA aeronautical study described below.

FAA Notification and Evaluation Process

Because the Proposed Project would result in exceedance of notification criteria, and consistent with ALUP Policy S-7, the Proposed Project would trigger the requirement to file a Form 7460-1, "Notice of Proposed Construction or Alteration" with the FAA. The Form 7460-1 application or notification through the OE/AAA system would be required to be submitted to the FAA at least 45 days prior to the start of any construction. This filing would prompt the FAA to conduct an aeronautical study to determine if the Proposed Project would create any obstructions into the airspace that would constitute a hazard to air navigation.

Certain information related to the Proposed Project must be provided as part of the FAA Form 7460-1 application process, including details on the Project Site and the dimensions of the Proposed Project temporary and permanent structures. The FAA would conduct an initial review of the Proposed Project and would determine whether to issue a Notice of Presumed Hazard (NPH) or a "Does Not Exceed" determination. The penetration of a FAR Part 77 imaginary airspace surface, such as that which could occur due to the temporary construction equipment that would penetrate the horizontal surface for HHR, would typically result in the issuance of an NPH. The FAA would conduct further evaluation of the Proposed Project effects on the airspace, taking into account the employment of recommended lighting and marking by the project applicant, and would either issue a "Determination of Hazard," indicating that the Proposed Project would exceed an obstruction standard and cause airspace or radar impacts that constitute a substantial adverse effect on air navigation, or a "Determination of No Hazard," allowing the Proposed Project to proceed, with recommendations for lighting and marking as provided for in the FAA's Advisory Circular (AC) 70/7460-1 "Obstruction Marking and Lighting."

As discussed above, to evaluate whether the Proposed Project components would constitute a potential hazard to air navigation, the CAG evaluation analyzed all 14 CFR Part 77 imaginary surfaces, published instrument approach and departure procedures, VFR operations, FAA MVAs, minimum IFR altitudes, and en-route operations. The following sections summarize the results of the CAG evaluation of the Proposed Project.

Construction Impacts

Construction cranes that would be employed at the Project Site through a majority of the construction period at the Arena Site would be anticipated to reach up to approximately 200 feet AGL (290 feet AMSL), but could exceed slightly this height depending on final design and construction planning, and required crane operations. The CAG evaluations determined that these temporary structures could potentially exceed 200 feet AGL at the Project Site, and thus would potentially penetrate the obstacle clearance surface for Localizer Approach to Runway 25L at LAX. In addition, the construction cranes would penetrate an imaginary surface that extends outward and upward at a 100:1 slope within 20,000 feet of HHR (see FAR Part 77.9(b)(1)). These would both trigger notification criteria established by the FAA in FAR Part 77.9.

Furthermore, as discussed above, the temporary construction cranes would penetrate the horizontal surface for HHR as defined in FAR Part 77.19. The triggering of the notification criteria as well as the penetration of imaginary horizontal and obstacle clearance surfaces may or may not be potentially deemed a hazard to air navigation by the FAA. Only the FAA final determination pending completion of the aeronautical study can determine whether the construction equipment would constitute a hazard to air navigation. Accordingly, this impact is considered **potentially significant**.

Operation

The largest permanent structure in the Proposed Project would be the up to 150-foot high Arena Structure. The 2017 and 2019 CAG evaluations determined that the Arena Structure would penetrate the horizontal surface for HHR. As discussed above, the penetration of an imaginary airspace surface would require the project applicant to submit Form 7460-1 with the FAA, prompting preparation of an aeronautical study to determine if the obstruction is a hazard to air navigation. Only the FAA's final determination pending completion of the aeronautical study can determine whether the construction equipment would constitute a hazard to air navigation. Accordingly, this impact is considered **potentially significant**.

The Los Angeles County ALUP. Safety Policy S-7 requires that projects located within the planning boundary/AIA for each airport comply with the height restriction standards and procedures set forth in Part 77. Conformity with the ALUP policies is required to obtain a consistency determination from the ALUC. Because the FAA final determination on the Proposed Project compliance with Part 77 is pending, the potential exists for an inconsistency with ALUP Safety Policy S-7. Accordingly, this impact is considered **potentially significant**.

Mitigation Measure 3.8-5

The project applicant shall submit an application to the Airport Land Use Commission (ALUC) for a determination that that the Project is consistent with the Airport Land Use Plan. The project applicant shall submit Form 7460-1, "Notice of Proposed Construction or Alteration," to the Federal Aviation Administration (FAA) or notify the FAA through the Obstacle Evaluation/Airport Airspace Analysis system, consistent with the requirements of 14 Code of Federal Regulations (CFR) Part 77, prompting completion of an aeronautical study to determine whether the Project would constitute a hazard to air navigation. A copy of the 14 CFR Part 77 notification shall be included in the compatibility review application for the Project.

Prior to the issuance of building permits, the project applicant shall provide the City with a copy of the ALUC-issued consistency determination, and the FAA-issued "Determination of No Hazard to Air Navigation." The project applicant shall implement all recommendations made by the FAA, including those for marking and lighting of project components that are determined to constitute obstructions in federal airspace, and any requirements set forth in the ALUC consistency determination regarding height restrictions.

Level of Significance After Mitigation: With the implementation of Mitigation Measure 3.8-5, the Proposed Project would not create a hazard to air navigation as a result of the penetration of imaginary airspace surfaces or obstacle clearance surfaces, and would not be inconsistent with the ALUP. Thus, this impact would be considered **less than significant**.

Impact 3.8-6: Construction and operation of the Proposed Project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Less than Significant)

The City's OES acts in coordination, conjunction and collaboration with all city departments to maximize the City's potential to prevent, prepare for, respond to, and recover from both natural and man-made emergencies and disasters. The 2010 MHMP generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among city departments. According to the MHMP, "all future development/redevelopment projects will be constructed to current design standards and building codes, and are not expected contribute to community vulnerability from natural or technological hazards."⁴⁶ The overall mitigation goals of the plan are to:⁴⁷

- Minimize the loss of life and property from natural hazard events
- Protect public health and safety
- Increase public awareness of risk from natural hazards
- Enhance emergency services including warning systems

⁴⁶ City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010. p. 21.

⁴⁷ City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010. p. 107.

The Proposed Project would be constructed in accordance with current design standards and building codes as discussed in Section 3.6, Geology and Soils, which is therefore consistent with the MHMP. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety. As a development project, the Proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services (also discussed more fully in Section 3.13, Public Services) and warning systems. Therefore, the Proposed Project would not substantively impair or interfere with the MHMP and the potential impact is **less than significant**.

For analysis of emergency access and traffic see Section 3.14, Transportation and Circulation.

Mitigation Measures

None required.

Cumulative Impacts

This section presents an analysis of the cumulative effects of the Proposed Project and other cumulative projects. While hazardous materials and hazard impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard, because of the relative infrequencies and the variances in timing, the geographic scope for cumulative hazards and hazardous materials impacts varies based on the hazard and the significance threshold being analyzed. Impacts relative to hazardous materials usually depend on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. For example, hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of a release, and could only be cumulative if two or more hazardous materials releases overlapped spatially and contemporaneously.

The timeframe during which the Proposed Project could contribute to cumulative hazards and hazardous materials effects includes the construction and operations phases. Similar to the geographic limitations discussed above, it should be noted that impacts relative to hazardous materials are generally time-specific. Hazardous materials events could only be cumulative if two or more hazardous materials releases occurred at overlapping times.

For cumulative impacts on schools within 0.25 miles of the Project Site, the cumulative context includes cumulative projects that would be located within 0.25 miles of one of the schools in proximity to the Project Site.

For other types of hazards, the cumulative context is different. For cumulative aircraft hazards, the analysis addresses a total of 35 cumulative projects that would be constructed within the LAX Planning Boundary/AIA. For consideration of cumulative impacts on emergency response, the evaluation is undertaken based on cumulative transportation analysis presented in Section 3.14, Transportation and Circulation, and includes the Proposed Project, plus 145 cumulative projects identified in Section 3.0, Table 3.0-2, along with accounting for other regional growth in the region.

Impact 3.8-7: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant)

A cumulative impact related to transport, use, or disposal of hazardous materials could occur if there were hazards releases in the vicinity and at the same time as a release associated with the construction or operation of the Proposed Project. For the purposes of this analysis, the geographic scope considered for analysis of this criterion is a 1-mile-radius area from the Project Site. A 1-mile radius is reasonable in light of the relatively small amounts and types of hazardous materials that would be associated with construction and operation of the Proposed Project.

The Proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The Proposed Project does not include any substantive emissions of hazardous materials such as might be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the Proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms contained in a Hazardous Materials Management Plan and Hazardous Materials Business Plan. The HHMD, as the CUPA, and other CUPA agencies for the cumulative projects outside of HHMD jurisdiction, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use or disposal of hazardous materials would be minimized, and in the unlikely event of a release, would likely be localized in extent.

As noted above, adherence to the regulatory requirements would ensure that incidents at the Proposed Project and other cumulative projects within a 1-mile radius are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the reasons described above, the Proposed Project, in conjunction with other cumulative projects, would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, this cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-8: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)

As described above, the geographic context considered for analysis of this criterion is a 1-mile radius around the Project Site because, while there is a potential for upset conditions associated with transportation of hazardous materials or wastes anywhere in the region, the most likely area where an accidental release from a cumulative project would cumulatively relate to a release associated with the Proposed Project would be within proximity to the Project Site.

Construction and operation of the Proposed Project, like the other largely residential and commercial cumulative projects identified in Section 3.0, Introduction to the Analysis, Table 3.0-2, would include the use of relatively small quantities of hazardous materials and generation of small amounts of hazardous wastes. The Proposed Project and other cumulative projects would not require the transport, storage, use, or disposal any unusually large, toxic, or explosive quantities of hazardous materials or hazardous wastes. The Proposed Project and other cumulative residential and commercial projects, would use, store, handle, and dispose of relatively limited quantities of hazardous materials, such as cleaning fluids, lubricants, paints, and fuels. Similarly, these types of projects generate small quantities of hazardous wastes, including small leftover amounts of hazardous materials previously discussed, paint cans, medical wastes and the like.

The Proposed Project and cumulative projects and their associated businesses would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the HMBP programs administered by the HHMD. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an accidental release was to occur, these programs require spill response measures to ensure that incidents are quickly contained and, therefore, would not travel off site in a way that could cumulatively combine to affect large numbers of people or affect substantial parts of the environment.

For the reasons described above, the Proposed Project, in conjunction with other cumulative projects, would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, this cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-9: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. (Less than Significant)

The geographic scope considered for analysis of this criterion is a 0.25-mile-radius area from the three schools that are within 0.25 miles of the Project Site. Based on an evaluation of the Cumulative Projects List presented in Section 3.0, Introduction to the Analysis, Table 3.0-2, there are three relevant cumulative projects:

- Cumulative Project #65, 3660 West 107th Street. A 3-unit apartment project that would be located 0.13 miles to Morningside High School;
- Cumulative Project #67, Hollywood Park Specific Plan. A major mixed use development currently under construction with cumulative development that would be located 0.24 miles from the TRF Head Start and Early Head Start preschool; and
- Cumulative Project #73, 3900 West Century Boulevard. The former Airport Park View Hotel that would be renovated and is located 0.21 miles from the TRF Head Start and Early Head Start preschool.

None of the other cumulative projects would be located within 0.25 miles of any of the three schools located within 0.25 miles of the Project Site.

As discussed above, construction and operations of the Proposed Project and relevant cumulative projects would require the use of limited quantities of typical and rather low risk hazardous materials, such as fuels, oils, and lubricants for construction and operational mechanical equipment; paints and thinners; and solvents and cleaners. These materials would be transported to the Project Site and cumulative project sites, and could travel on routes near one of the three relevant schools. If not handled and transported properly and safely, the transport of hazardous materials could result in accidental releases near schools, exposing students, employees, and other visitors to hazardous materials. The greater the number of projects under construction or in operational phases, the greater the likelihood that some sort of accident could occur resulting in a release and exposure of people or the environment. Further, in the unlikely event that two or more accidental releases occurred at the same time and within 0.25 miles of a school, the potential exists for a larger release than would occur with just the project or an individual cumulative project.

The Proposed Project, and the three relevant cumulative projects, are all the type of residential and commercial uses that use hazardous materials and create hazardous wastes that are typical of the project vicinity. None of these projects would use types or quantities of hazardous materials that create risks beyond those that exist in the vicinity under existing conditions. As discussed in the Regulatory Setting, transportation of hazardous materials is regulated by US DOT and Caltrans. Together, these federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, as discussed in the Regulatory Setting, businesses that use hazardous materials, including construction companies (short-term construction) and operating businesses and facilities (long-term operations), are required to prepare and implement HMBPs describing procedures for the handling,

transportation, generation, and disposal of hazardous materials. The Proposed Project, along with all cumulative projects and operating businesses would be required to comply with the same regulations. Compliance with these enforceable federal, State, and local regulations would reduce the risks of exposure to hazardous materials or wastes in the vicinity of Delores Huerta Elementary School, Morningside High School, and/or the TRF Head Start and Early Head Start preschool.

Because a comprehensive and enforceable set of federal, State, and local laws and regulations govern the transport, storage, use and disposal of hazardous materials and wastes to reduce the potential for accidental release and exposure of people and the environment, and because the type and quantity of hazardous materials used at the Proposed Project and other cumulative projects would be small and typical of current development and business operations, the risk of the emission of hazardous materials within 0.25 miles of a school would be negligible.

For the reasons described above, the Proposed Project, in conjunction with other relevant cumulative projects, would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. Therefore, this cumulative impact is **less than significant**.

Mitigation Measures

None required.

Impact 3.8-10: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could be located on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, could create a significant hazard to the public or the environment. (Less than Significant)

For the most part, the types of hazardous materials that result in sites being listed pursuant to California Government Code section 65962.5 involve soil or limited groundwater contamination associated with past uses of the project site. For many of these types of contaminants, including those that are known or suspected to occur on the Project Site, the potential hazards to the public or environmental are isolated to the site and are not cumulative in nature. Nevertheless, to conduct a conservative analysis of hazards related to past contamination, this Draft EIR has established a geographic scope for analysis of this criterion that is an area with a 1-mile radius from the Project Site.

As noted above in Section 3.8.1 and within the 2019 EKI Technical Memorandum, the Project Site and vicinity within a 1-mile radius includes numerous sites with documented past uses that are indicative of a potential to find contamination present, as well as documented unauthorized releases of hazardous materials. The sampling of surface soils on the Project Site conducted in 2017 and 2019 detected contaminants at levels above residential screening levels, but in most cases below commercial/industrial screening levels.⁴⁸

⁴⁸ EKI Environment & Water Incorporated, 2019. *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations*, Technical Memorandum, June 28, 2019.

Most of the cumulative projects located within 1 mile of the Project Site would include earthwork activities that could encounter legacy contaminants from releases that occurred in the past. Potential cumulative impacts could occur if the earthwork activities of the Proposed Project would take place concurrently with other cumulative construction activities, creating the potential for multiple exposures to legacy contaminants. Potential cumulative impacts could also occur if cumulative projects that require remediation would combine to create emissions or exposure hazards from remediation activities, including off-site disposal.

The likelihood of more than one of the cumulative projects having had a substantial hazardous materials release that affects the same resources within the same temporal period as the Proposed Project is low based on the fact that the sites are dispersed throughout the area, exposure risks vary considerably, and many of these hazardous materials sites that do require more investigation or remediation are in varying stages of progress. In general, impacts related to hazardous materials from previous releases are more site-specific and can only combine through limited mechanisms: releases through routine transport of hazardous materials and waste to or from the site during remediation that use the same roadways or releases of hazardous materials through accidental upset conditions of those transported materials.

Due to the stringent regulations governing the transport of hazardous materials, including regulations on the type of container used for transport, the probability of such transport resulting in emissions or releases from accidents that would cause a significant cumulative impact is low. While upset and accident conditions could occur, they generally occur as isolated events that do not combine with other projects because the types of soil-borne contaminants are relatively stable and unlikely to be widely spread, unlike other types of hazardous materials that can be explosive or spread quickly through vapors or other gaseous emissions. All cumulative projects in the vicinity would be required to comply with similar transportation regulations, which proscribe the transport of hazardous materials safely to and from their destination.

For the reasons described above, the risks of exposure caused by release of legacy contaminants on the sites of cumulative projects in the vicinity of the Project Site would not combine with the risks of exposure associated with the Proposed Project. Therefore, the Proposed Project, in conjunction with other cumulative projects, would not create a significant hazard to the public or the environment as a result of being included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5. This cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-11: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would be located within an airport land use plan area and could cumulatively result in a safety hazard or excessive noise for people residing or working in the project area, or could create a hazard to navigable airspace and/or operations at a public airport. (Less than Significant)

The Proposed Project along with all other past, present, or reasonably foreseeable future projects located within the County's ALUP Planning Area/AIA are required to be consistent with the ALUP policies. In addition to the Proposed Project, a total of 35 projects on the Cumulative Project List in Section 3.0, Introduction to the Analysis, Table 3.0-2, would be located within the LAX Planning Boundary/AIA.

As discussed above under Impact 3.8-5, ALUP Policies G-1 and N-3 state that the compatibility of proposed land uses is determined by consulting the land use compatibility table provided in Section V of the ALUP. The ALUP Land Use Compatibility Table identifies land use by category, including residential, commercial, and industrial land use. The elements of the Proposed Project generally fall within the commercial and recreational land use compatibility categories. Almost all the cumulative projects are residential or commercial in nature. The compatibility criteria provided in the Land Use Compatibility Table advises review of noise insulation needs for residential, commercial, and recreational land uses in areas exposed to CNEL 65 to 70 dB within the ALUP CNEL Contour. The same criteria apply to commercial and recreational land uses in areas exposed to exposed to CNEL 70 to 75 dB within the ALUP CNEL Contour. While the ALUP advises avoiding development of residential uses, reduction of interior noise levels to acceptable levels is typically achieved through standard residential and commercial building construction practices, and thus is reasonably foreseeable that no significant noise impacts would occur within the cumulative projects. As such, people residing or working in the cumulative projects that would occur within the LAX Planning Boundary/AIA would not be exposed to excessive noise from airport operations.

A cumulative safety hazard, or the creation of a cumulative hazard to navigable airspace or operations could occur where the design and location of a new structure or temporary construction equipment associated with the Proposed Project or other cumulative projects within an airport planning boundary or AIA would penetrate imaginary surfaces established for an airport and interfere with safe operation of aircraft. ALUP Policy G-4 prohibits any land use which will negatively affect air navigation and Policy S-7 requires all projects located within the planning boundaries/AIAs for the County's airports comply with the height restriction standards and procedures set forth in 14 CFR Part 77. This regulation requires that projects higher than 200 feet AGL and/or with potential to penetrate the imaginary airspace surfaces file notification with the FAA via Form 7460-1. Filing Form 7460-1 prompts the FAA to complete an aeronautical study to determine if the Proposed Project would be an obstruction to the airspace that could serve as a hazard to aircraft. If an aeronautical study undertaken for a cumulative project were to indicate that a project would serve as a hazard to aircraft operating in the area, it would be unlikely the Proposed Project would be approved unless or until it was altered to eliminate the potential airspace hazard. Accordingly, the Proposed Project, in conjunction with

other cumulative projects within the LAX Planning Boundary/AIA not result in a safety hazard or create a hazard to navigable airspace and/or operations at a public airport.

For the reasons discussed above, the Proposed Project, in conjunction with other cumulative development, would not cumulatively result in a safety hazard or excessive noise for people residing or working in the project area, or could create a hazard to navigable airspace and/or operations at a public airport. Therefore, this cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-12: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Less than Significant)

The geographic scope considered for the analysis of this criterion is the City of Inglewood and the geographic area considered in the MHMP. The City is vulnerable to several hazards identified in the plan including earthquakes, hazmat release, and human threat events/terrorism. The City's OES acts in coordination, conjunction and collaboration with all city departments to maximize the City's potential to prevent, prepare for, respond to and recover from these hazards. The MHMP considers future projects that are constructed in accordance with current design standards and building codes as not being vulnerable to natural or technological hazards.⁴⁹ The plan is structured to identify community policies, actions and tools for implementation over the long-term that will result in a reduction in risk and potential for future losses community wide.

The Proposed Project in conjunction with other cumulative projects that would similarly be constructed to current design standards and building codes, would not impair or interfere with the MHMP or the City's ability to prevent, prepare or respond to and recover from the identified hazards because existing codes are designed to minimize hazards and protect public health and safety. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety with requirements for safety, access, and evacuation. Therefore, the Proposed Project would not combine with other cumulative projects to become cumulatively considerable and the potential impact would be **less than significant**.

Mitigation Measures

None required.

⁴⁹ City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010. p. 21.